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State Water Resources Control Board  
ATTN: Jessica Bean, [Jessica.Bean@waterboards.ca.gov](mailto:Jessica.Bean@waterboards.ca.gov)

RE: Comments on the State Water Board's Mandatory Conservation Proposed  
Regulatory Framework

To Chairwoman Marcus and the State Water Board:

The City of Escondido understands the seriousness of the current drought and supports the Governor's and the State's efforts to protect and reserve water supply now for an uncertain future. The City has proven this understanding and support by recent actions that build on its longer-term commitments to water supply safety and reliability. The City requests that the State Water Board consider the following along with the comments from San Diego County Water Authority as it prepares to implement the requirements of Executive Order B-29-15.

**1. Allow time for lasting change that supports California's economy and way of life to take place.**

Awareness of the severe drought situation is growing. The number of Escondido residents and businesses interested in water conservation is growing. They are participating in workshops and classes teaching water-wise landscaping, using rebates to replace water-wasting appliances, reporting water waste in the community, and taking advantage of financial incentives to replace ornamental turf with California-friendly plants. As residents and businesses find a more sustainable, less resource-intensive way of living and doing business here, the benefits of these changes are realized over time. The lasting impact of these lifestyle changes is that California will be better prepared for future droughts.

The City of Escondido has an Urban Water Management Plan and is in compliance with the Best Management Practices/Demand Management Measures. It has a drought ordinance and conservation pricing. It participates in local and regional rebate and educational opportunities, and promotes those through an active public outreach effort. These existing tools, along with pending allocation cuts from our water suppliers, will show further conservation gains and should be allowed to continue guiding local decisions.

**2. Use a broader baseline that will better measure change.**

As this awareness has increased, the number of customers making permanent changes to their water habits has also increased. The savings, though, cannot be measured by one 30-day increment. Choosing one month from 2013 does not capture the improving trend over many years, the impacts of weather, or any other unique occurrence. An earlier, broader baseline should be used.

**3. Focus the mandatory restrictions on discretionary outdoor use while encouraging reductions of other uses.**

The City of Escondido, along with its regional partners, has invested heavily in the planning, securing and production of additional water supplies. While those supplies remain available, mandatory cuts should not threaten industrial and commercial production or local agriculture, which are important components of the local economy. A strong, growing economy enables changes today, and prepares and preserves resources for the future.

There is still much room for improved efficiencies in the planting and technology of outdoor ornamental landscaping. Efforts focusing on this area of discretionary use are encouraged.

The City of Escondido is working hard to help its customers eliminate water waste and minimize discretionary use, and it already has among the lowest average daily consumption rates per resident in the San Diego region (3<sup>rd</sup> lowest out of 22 agencies). The City is ready to do more in the face of the state's severe drought, but asks that the State recognize and build on the success of the current framework. Instead, the proposed across-the-board cuts that include commercial, industrial and agricultural uses would penalize retail agencies without accounting for past success. The City of Escondido requests that the State Water Board consider these comments, along with comments from San Diego County Water Authority, as it prepares to implement the latest executive order.

Sincerely,



Sam Abed  
Mayor, City of Escondido