



# City of Del Mar



April 13, 2015

Jessica Bean  
State Water Resources Control Board  
State of California  
Jessica.Bean@waterboards.ca.gov

Dear Ms. Bean:

This letter is sent on behalf of the City of Del Mar to express several concerns regarding the draft regulatory framework to comply with Governor Brown’s April 1<sup>st</sup> Executive Order.

The City of Del Mar appreciates the urgency of the current drought conditions and the need for bold action to achieve the necessary water supply cutbacks. However, we have several unique concerns with the proposed methodology.

The City of Del Mar is a small, two-square mile city of approximately 4,500 residents (and a high visitor population) located in north San Diego County. As a small water supplier with approximately 2,000 connections, based on the proposed regulations, the City of Del Mar would face a mandated 25% reduction in water use based on June through November 2013. This mandate is problematic for Del Mar for the following reasons:

- 1) Since the previous drought of 2007-2010, Del Mar’s total water use has never returned to the pre-2007 peak quantities. In recent years, Del Mar’s water use has generally been about 20% less than the time period prior to 2007. Through a variety of measures, such as expanding use of recycled water, landscaping changes, and increased residential and business water efficiency, Del Mar residents, businesses, and institutions have made long-term, sustainable change in their water use. While we recognize that a 25% water supply cutback would not be easy for any community in California, the proposed mandate for an additional 25% cutback would translate into a very serious problem for Del Mar.

Fiscal Year	Water Sales (Acre Feet)
2003	1,292.10
2004	1,374.53
2005	1,308.16
2006	1,299.49
2007	1,358.52
2008	1,243.70
2009	1,151.71
2010	1,114.98
2011	1,010.71
2012	1,045.82
2013	1,083.43
2014	1,106.27

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- 2) Since Del Mar's implementation of conservation measures as part of the last drought, the City's use of water has been essentially flat, despite a massive rebound in our heavily tourism-based economy since the recession and strong increases in hotel occupancy rates. Del Mar's hotels have already implemented low-flush toilets, towel reuse programs, and landscape irrigation conservation measures and have little capacity to make additional cuts.
  
- 3) The City of Del Mar is home to the State of California 22<sup>nd</sup> District Agricultural Association Fairgrounds (also know as the San Diego County Fairgrounds of the Del Mar Fairgrounds). The Fairgrounds hosts approximately 300 regional events each year, attracting three million visitors annually. Most prominently, these annual events include the four-week San Diego County Fair in June, the thoroughbred racing season July through September, and a new fall horse race meet in November. While the Fairgrounds uses recycled water for landscape irrigation, the Fairgrounds' water use during the proposed June through November base period represents 16% of the City's total water use during that timeframe. The City of Del Mar will work closely with the Fairgrounds to encourage their partnership on this matter, but the reality is that most of the water used is for restrooms and hospitality to serve the patrons of these events.

In addition to the concerns state above, the City of Del Mar concurs with the regional concerns expressed by our water wholesaler, the San Diego County Water Authority.

The City of Del Mar is committed to conserving its fair share, aggressively educating the public, and targeting outreach efforts to achieve the greatest results, but the structure of the proposed mandates is simply not equitable or realistic for a small city like Del Mar that has already demonstrated long-term sustained change in maximizing water efficiency and that supplies water for a major regional event center like the Del Mar Fairgrounds.

Thank you for taking our comments into consideration.

Sincerely,



Scott W. Huth

City Manager

c: Mayor and Members of the City Council  
State Assembly Member Toni G. Atkins  
State Senator Marty Block  
Maureen Stapleton, San Diego County Water Authority