



April 22, 2015

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

RE: Comments on Draft Emergency Drought Regulations Issued on April 18, 2015

Dear Chair Marcus,

This letter is being submitted as Padre Dam Municipal Water District's comments on the Draft Emergency Regulations issued on Saturday, April 18, 2015.

Please know that the urgent and critical nature of the task before the State Water Resources Control Board is fully recognized by Padre Dam. We especially appreciate the State's provision to use a cumulative measurement for comparing savings, rather than month-to-month comparisons. Padre Dam strongly supports this new approach.

We strongly recommend the State Board consider the following points when working toward final regulations:

1. **Post and utilize the most up-to-date data submitted by agencies on the DRINC portal monitoring report for calculating conservation standards tiers.** Some agencies, including Padre Dam, made important changes to ensure our data is accurate. Using the most up-to-date information will ensure the State is providing the best possible data for all agencies.
2. **Acknowledge local efforts to develop alternative water supplies which reduce demand on water supplies from the State Water Project.** San Diego County's new desalination facility will begin providing water to the San Diego region in September 2015 - during the 270 day emergency regulation period. This added supply will reduce the water currently imported into the San Diego region positively impacting the State's water resource situation. We strongly urge the State to allow a credit for this and other new water supplies that will be coming online during the emergency regulations timeframe.

Padre Dam recently opened an Advanced Water Purification Demonstration Project. This is a new water supply development project using potable reuse technology. Our hope is projects like this will allow Padre Dam and other agencies to be less reliant on imported water supply sources in the future. With the current draft regulations agencies like ours lose incentive to develop these new water supplies. We feel this is the wrong message to send. Communities that have invested in local resources should be credited for those investments.

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3. **Consider and recognize different climates throughout California that would significantly impact a variance in R-GPCD numbers.** A coastal agency is naturally more likely to have a lower R-GPCD than an inland agency with significantly higher average temperatures. These differences do not signify that the coastal agency has conserved more but simply that less water is necessary in that community.
4. **Consider a credit for agencies that receive water from other sources than the State Water Project.** Approximately 30 percent of San Diego County's water supply comes from the State Water Project. The majority comes from other sources, including more than 60 percent that comes from the Colorado River - outside of California and not currently facing any supply restrictions. However, under the current proposed framework, agencies receive no credit for having other supply sources. In fact, these supplies would be included in the overall cutback that agencies are asked to achieve. Some of this supply carries contractual obligations which should not be ignored.
5. **We encourage the State to continue to look at developing collective conservation standards.** This could assist in reducing the burden on one specific agency.
6. **Delay the effective date of the final regulations until July 1, 2015** to allow retail agencies a reasonable period of time to implement the final regulations and customers the time to respond to the new requirements.
7. **Work with retail agencies to maximize flexibility in achieving conservation targets within our respective service areas.** Each agency is unique in nature and a one-size fits all approach for enforcing compliance will not be effective.

Padre Dam would like to thank you for the opportunity to provide our comments on the Draft Regulations. We look forward to finding the final regulations to be equitable and effective in moving California through the challenge of the current drought.

Sincerely,



Allen Carlisle
CEO/General Manager