



CITY OF OCEANSIDE

WATER UTILITIES DEPARTMENT

4/22/2015

State Water Resources Control Board
Attn: Jessica Bean, Jessica.Bean@waterboards.ca.gov
1001 I Street, 24th Floor
Sacramento, CA 95814

Dear Ms. Bean and Members of the State Water Resources Control Board:

Thank you for the opportunity to comment on the Board's proposed regulatory framework to achieve a 25 percent statewide reduction in potable urban water use.

The City of Oceanside is an urban water supplier serving 44,000 customers in San Diego County. We appreciate the immediacy of the Governor's call to action and the State's efforts to balance water needs with increasingly challenging water supply projections. Clearly, the need to save water and improve efficiencies is becoming more important every day. However, after reviewing the Board's proposed framework, we have several concerns and would like to offer the following feedback for consideration.

1. **The proposed 2013 baseline for water reduction targets punishes those who have conserved and rewards those who have not.** Between 2007 and 2011, Oceanside's per capita water use declined by 26 percent and we have a sustained reduction of 17 percent as of 2015. By failing to account for this conservation, the proposed framework punishes those who have conserved (including Oceanside) 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 recognize nor give any credit to agencies or regions that have made substantial and costly investments in drought resistant and sustainable local water supplies in order to free up water for the rest of the State.

The City of Oceanside has invested heavily in the planning, securing and production of additional water supplies. Those projects include Indirect Potable Recharge (IPR), studies into Seawater desalination, and advancement of our recycled water plant improvements and pipeline conversion. In addition to Oceanside's own local investments, the San Diego region has also made significant investments in regional sustainability including the following:

- The Carlsbad Desalination Plant creates drinking water supplies from limitless ocean water.
- The San Diego County Water Agency entered into an agreement with the Imperial Irrigation District to free water supplies by paying farmers to fallow fields. This program is funded on the take-or-pay basis requiring County residents make payments regardless of ability to utilize freed supplies.

- All American and Coachella Canal Lining preserves water from the Colorado River that would otherwise be lost due to groundwater seepage.
 - The San Vicente Dam raise allows County residents to store precious water supplies from both Northern California and the Colorado River in order to weather extreme drought conditions.
3. Regulations should not discourage new supply development, but rather recognize such efforts and investments in keeping with the direction in Governor's California Water Action Plan. Under the Board's proposed regulations, Oceanside ratepayers would experience no water supply reliability benefit from the water produced by the City or regionally through the SDCWA.
 4. **The proposed framework threatens industrial and commercial production and local agriculture.** We recommend the State Board remain focused on reducing discretionary outdoor water use and not impose potentially crippling cutbacks to industrial and commercial production as well as local agriculture which are critical to maintaining the livelihood of businesses and of our local economy.
 5. **Lastly, we recommend that the State Board allow regional drought management through existing drought management plans that have been in place and used successfully during previous droughts to manage water supply and demand.** We further request that San Diego County water agencies be given the consideration of a regional cutback goal of 12% and not an agency by agency cutback approach.

I appreciate the opportunity to submit our response to the proposed drought regulatory framework and would welcome any questions or requests for further input or elaboration.

Sincerely,



Jason Dafforn
Interim Water Utilities Director

cc: Michelle Skaggs-Lawrence, Interim City Manager
Oceanside Mayor and Members of the City Council