



May 4, 2015

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

RE: Comment Letter – Emergency Conservation Regulation Issued on April 28, 2015

Dear Chair Marcus,

Padre Dam Municipal Water District appreciates the opportunity to provide comments on the Proposed Final Emergency Regulations issued on Tuesday, April 28, 2015.

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 urge the State Board consider the following points when working toward final regulations:

1. **Padre Dam does NOT support a two-percent incremental change to the proposed conservation tiers.** We believe the current proposed four percent increments are more than adequate.
2. **Acknowledge any new drought-proof water supplies developed after 2013 and provide a credit for this water against commercial and industrial customers.** The San Diego County Water Authority has worked thoughtfully on a submitted change proposal to credit any new drought-proof water supplies against water consumption by commercial, industrial and institutional customers.

The San Diego County Water Authority's proposal is a creative approach to addressing two important concerns: lack of recognition for development of drought-proof local water supplies, and potential impacts to the business, industrial and manufacturing sectors.

Padre Dam strongly urges you to modify the proposed final regulations to incorporate the concept of crediting any new drought-proof water supplies against water consumption by commercial, industrial and institutional customers. This action would

BOARD OF DIRECTORS
Douglas S. Wilson
Augie Scalzitti
Bill Pommering
August A. Caires
James Peasley

9300 Fanita Parkway
Santee, CA 92071
T 619 448 3111
F 619 449 9469
www.padredam.org
PO Box 719003
Santee, CA 92072-9003

show an appreciation for the wise, local and regional investment in new water supply development that is occurring, and provide an important signal to the business and manufacturing communities that their concerns are being heard and that the State values their continued contribution to our thriving economy.

3. **Allow all urban water suppliers the ability to exempt any commercial agriculture, not limiting this exemption to only those serving at least 20 percent to commercial agriculture.** This would allow all commercial agricultural operators to remain equal regardless of the amount of agricultural water served by their water provider. To ensure the validity of all agricultural water, agencies under the threshold could be required to submit an Agricultural Water Management Plan.
4. **We encourage the State to continue to look at developing collective conservation standards.** This could assist in reducing the burden on one specific agency.

Padre Dam would like to thank you for the opportunity to provide our comments on the Proposed Regulations. We appreciate the hard work and efforts by the State Water Board to meet the Governor's goal and balance appropriate regulations against the challenges of the drought.

Sincerely,

A handwritten signature in black ink, appearing to read "Allen Carlisle". The signature is fluid and cursive, with a prominent initial "A".

Allen Carlisle
CEO/General Manager