



## Helix Water District

(12/7/15) Public Workshop  
Urban Water Conservation  
Deadline: 12/2/15 by 12:00 noon

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November 30, 2015

To: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Jeanine Townsend, Clerk of the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814



### **Subject: Comment Letter – Urban Water Conservation Workshop**

Dear Ms. Townsend:

We appreciate the opportunity to submit these comments regarding potential changes to the emergency regulations for statewide urban water conservation to the State Water Resources Control Board. We understand the severity of water challenges facing our state and appreciate the various constraints under which the board is operating to achieve increased water conservation during drought conditions through the current emergency regulations.

Helix Water District is an urban water supplier which serves over a quarter million people east of San Diego. Our customers have exceeded the water conservation mandates established by the SWRCB for our district. We have worked diligently to reduce our costs by cutting back our capital improvement program in order to keep our water rates reasonable for our customers. However, the SWRCB emergency regulations have put significant added pressure on the cost of water. The district has contributed millions of dollars to support the water reliability improvements in the San Diego region. To date, this investment has not been reflected by the SWRCB in the emergency regulations.

This has caused significant confusion and frustration for our customers who are paying more for water reliability projects but told they can't benefit from those projects. It is akin to adding an additional room on to a house but then not utilizing the additional space after making the significant investment. It doesn't make sense economically. Our customers are paying more for water while they are using less even though this region has access to 99 percent of the water needed.

The current regulations focus on achieving the state's water reduction standards solely through conservation. They do not allow regional or local water agencies to realize the benefits of their investments in water supply reliability – investments in self-reliance that are consistent with Governor Brown's Water Action Plan. In San Diego County, water agencies have invested billions of dollars in developing a portfolio of sustainable water supply, specifically designed to make our region less vulnerable to droughts and devastating water supply cutbacks. However, the current regulations strip away the drought protections these supplies provide by not allowing the region to benefit from

these investments. This approach has understandably angered our customers and threatens to discourage them from supporting future water supply investments, stunting California's ability to meet the needs of its growing population amid a changing and more challenging climate.

The imposition of demand reduction targets as the state's primary drought response places California at a competitive disadvantage in terms of business attraction and business expansion. Businesses are unlikely to relocate to, or expand their businesses in California under prolonged water use reduction mandates that ignore the availability of sustainable water supplies to meet our state's economic needs. These businesses and industries need to be convinced that the state is doing everything in its power to develop new and drought-resilient water supplies to serve their businesses. An important step the state can take now is amend the regulations to provide credits for new supply development.

The regulations are threatening property values by inhibiting efforts to re-landscape dead lawns with water-smart plants, which require irrigation to establish even though they reduce overall water use in the long run and also provide aesthetic and environmental benefits. Without healthy landscapes, soil erosion and stormwater runoff will increase, wildlife habitat will decrease and the urban heat island effect will intensify.

The district supports the regional approach to ensuring the emergency regulations are met. The San Diego region, under the leadership of the San Diego County Water Authority, our water wholesaler, has worked together successfully to manage water resources and infrastructure including improving water reliability and sustainability. This region has a demonstrated, successful track record of working collaboratively and would like the opportunity to do so to meet the emergency regulations.

Finally, it is critical to maximize the water reliability benefits of drought-resilient and sustainable water supplies, such as the Carlsbad Desalination Project, during drought conditions to help support California's economy and quality of life. That's why we support modifications to the emergency regulations to allow water agencies such as ours, to meet reduction targets through a combination of conservation and the leveraging of sustainable drinking water supplies, such as desalination, potable reuse and long-term transfers of conserved water through a regional approach. This is a more balanced, more flexible approach that recognizes the significant investments San Diego County ratepayers have made toward the development of a drought-resilient water supply. It will help save water now and better prepare California for future droughts.

Sincerely,



DeAna Verbeke  
Board President  
Helix Water District