



Sam Abed  
Mayor  
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December 1, 2015

Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814



*Via email at: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)*

Re: Comment Letter – Urban Water Conservation Workshop on December 7

Dear Ms. Townsend:

Please accept these comments from the City of Escondido concerning proposed changes to the Emergency Regulations for Statewide Urban Water Conservation. I wish to submit these comments for consideration at the State Water Resources Control Board's meeting scheduled on December 7, 2015.

The City of Escondido is very concerned that the current regulations place our State at a competitive disadvantage when attracting new businesses. Existing and prospective business owners are concerned that their future success may be limited by scarce water. The existing regulations - which require demand reductions but offer no credits for supply developments - do little to allay these concerns.

Our citizens are very concerned about future water availability. Prior to the implementation of emergency regulations, we could assure our community that our region was benefitting from its enormous investment in water supply reliability and would continue to benefit from these investments into the future. However, the existing emergency regulations do not allow local water agencies to reap the important reliability benefits of these investments. Therefore, members of our community rightly feel that they have spent enormous sums on infrastructure yet are not benefiting from the more reliable supply. This with have a chilling effect of future efforts to expand our supply.

The regulations also stall efforts to re-establish brown lawns with California friendly landscapes. These landscapes require an up-front investment of water as the plants are establishing themselves. The regulations discourage this even though long-term water use would be reduced and the aesthetics of our community would be improved.

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We request that the Board seriously consider the following:

1. Consider local supply conditions when adjusting demand reduction mandates. For example, the San Diego region has enough supply to meet its demand but is unable to use this water;
2. Recognize proposals submitted for an “Alternative Path to Compliance,” e.g. the proposed path submitted by the San Diego County Water Authority;
3. Retain the so-called Agricultural Exclusion that allows qualifying agricultural water use to be excluded from calculations assessing compliance with demand reduction mandates. Escondido’s agricultural industry is critical to the economic health of our city. This industry has been under enormous pressure from rising water rates. Further pressure to reduce agricultural demand for water would only accelerate the loss of agricultural land.

The City of Escondido supports a balanced approach to meeting the challenge of this drought, including a combination of conservation, increased recycled water use, drinking water reuse, seawater desalination, and credit for long-term water transfer agreements.

If you have any questions about these comments, please contact Christopher McKinney, Director of Utilities, at “cmckinney@escondido.org” or by phone at 760-839-4090.

Sincerely,



Sam Abed  
Mayor, City of Escondido

Cc: Clay Phillips, City Manager  
Graham Mitchell, Assistant City Manager  
Christopher W. McKinney, Director of Utilities