

From: [Melissa McChesney](#)
To: [DWR Water Use Efficiency](#); [commentletters](#)
Cc: mmcchesney@padre.org; [Kyle Swanson](#); [Allen Carlisle](#)
Subject: September 19-20, 2016 Urban Advisory Group Meeting Comment Letter
Date: Thursday, September 15, 2016 4:59:22 PM
Attachments: [image001.png](#)
[image002.jpg](#)
[PadreDamMWDLongTermWUECommentLetterSept2016.pdf](#)

Please find attached Padre Dam Municipal Water District's comment letter on the proposal for Long-Term Water Use Efficiency Framework being discussed at the Urban Advisory Group Meeting on September 19-20, 2016.

Thank you,
Melissa

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September 15, 2016

California Department of Water Resources
c/o Marty Berbach, Senior Environmental Scientist
Water Use Efficiency
901 P Street
Sacramento, CA 95814

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

Delivered via email to: WUE@water.ca.gov; commentletters@waterboards.ca.gov

Subject: Comment Letter - Proposal to Implement Executive Order through Long-Term Water Use Efficiency Framework

Dear Mr. Berbach and Ms. Townsend:

On behalf of Padre Dam Municipal Water District, I would like to thank you for the opportunity to submit comments on the long-term water use efficiency framework that is in development. We wish for our comments to be included in the Urban Advisory Group Meeting on September 19-20, 2016. We appreciate the State's process to date which has allowed retail water agencies like ours to be a part of the planning process, especially since we are the ones that will be implementing the framework and working directly with the communities we serve.

Padre Dam's customers have shown their ability to reduce water use time and time again. During the 2009-2010 drought we had a 32 percent reduction in water use. In 2016, customers continue to use a cumulative 25 percent less water than they did at the same time in 2013. With this extraordinary conservation, Padre Dam is considerably exceeding our SBx7-7 goals.

We would like to offer the following comments as the Urban Advisory Group meets to further discuss draft framework:

Framework Process

California is a large and extremely geographically diverse State that will face challenges in attempting to fit all regions and agencies into one box. Diversity must be considered in the design and implementation of the conservation framework.

The framework development process must be equitable, defensible and transparent. Padre Dam understands the Executive Order's deadline of issuing the framework by January 2017 and can support that; however the primary consideration must be that the best framework for water use efficiency is developed. We suggest extending the deadline for the development of permanent water use reductions, targets and numbers to allow for adequate feedback and adjustments to the framework that will impact the future of California's water use.

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Strengthen Local Drought Resilience - Water Shortage Contingency Plans (WSCP)

Provide guidance on developing a WSCP, allowing agencies flexibility to create a WSCP that best suits their local or regional situation. Padre Dam does not support developing uniform WSCP levels for the entire State, as circumstances in one area of the State could be dramatically different than other areas. It is incredibly difficult to communicate to local customers that they must cut back when local storage reservoirs are full and all regional water use demands are being met.

Actual demand reduction should be considered when setting state triggers rather than arbitrarily tying specific percentages to WSCP stages.

Use Water More Wisely - Targets

Padre Dam strongly supports the development of drought-resilient water supplies as does the Governor's Water Plan for California. For that reason, we recommend that water use targets apply only on imported water and exclude drought-resilient supplies such as recycled water, potable reuse and desalinated water. The Governor's Executive Order identifies that agencies need to "strengthen local drought resilience" and local drought-resilient supplies achieve this goal.

All irrigable acres should be included in DWR landscape area measurements. Agency customers that responded significantly to the Governor's orders to conserve during the current drought and water use reductions may appear to have non-irrigated property at the time of landscape area measurements. However, new water efficient landscapes may be put in at a future date. This new landscape would be a significant improvement to the community while using water efficiently and therefore should receive credit in landscape area measurements.

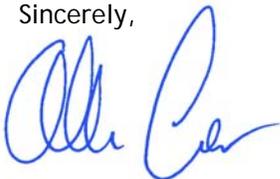
Padre Dam has strong concerns that the framework for establishing water use targets is unmanageable without significant expense, time, money and resources at the State and local levels. For example, the majority of retail water agencies do not have the necessary information about our customers that would be required to verify the targets developed by DWR.

We encourage the State to consider completing an economic study on the impacts of the proposed commercial, institutional and industrial sites. This would identify significant financial challenges with the proposed framework that would unfairly burden agency customers with this financial responsibility.

It is important to communicate clearly what the need and desired goal of the water use targets are to the general public. In order to achieve the State-wide goals the public should know precisely why a reduction in use is necessary, and what beneficial outcome the reduction will achieve.

Thank you again for the opportunity to provide comments and we hope you will consider these issues as the development of the draft framework continues and will impact the future of California's water use.

Sincerely,



Allen Carlisle
CEO/General Manager