

September 16, 2016

California Department of Water Resources
Water Use and Efficiency Branch

Attention: Kent Frame, Peter Brostrom, Erik Ekdahl, Max Gomberg, et al.

Re: Comments Regarding Urban Advisory Group Workshops (submitted via email)

Thank you for the opportunity to provide input into this process. Below, please find Camrosa Water District's comments regarding the issues covered at the two Urban Advisory Group workshops so far this month: Water Shortage Contingency Planning and Water Use Targets.

WATER SHORTAGE CONTINGENCY PLANNING

LONG-TERM PLANNING: Camrosa encourages the state to consider decoupling to the greatest extent possible long-term "drought-risk assessments" and water-supply planning from the WSCP. Long-term planning is best handled by Urban Water Management Plans, where it is currently situated.

HYDROLOGY: Hydrology should inform long-term planning, and should match the hydrology used in the development of groundwater sustainability plans required under the Sustainable Groundwater Management Act. The groundwater implications of hydrologic changes (whether year to year or as a result of climate change) will be reflected and accounted for in GSPs. In order not to duplicate or unnecessarily complicate efforts, the state's focus with regard to WSCPs should remain on short-term supply sufficiency, rather than on the context of long-term supply planning, whose complexity defies the swift response required by the threats WSCPs ostensibly address. Between long-term planning in UWMPs and the supply/demand analysis described below, drought conditions in certain hydrologic regions would no longer necessitate blanket demand-reduction mandates from the state. They might focus the state's attention on the agencies within a certain region, but they shouldn't be more informative than the annual supply/demand analyses the state would, under the proposed framework, receive every year.

SUPPLY/DEMAND ANALYSIS: More immediate assessments of agencies' ability to meet demand year to year should be met by annual supply-demand assessments—a more robust and nuanced "self-certification" process that we all went through earlier this year. Agencies would perform these every spring and submit them electronically to the state. The state would then be able to automatically compile and analyze these assessments, and focus its energy on supporting those agencies that report a supply insufficiency. This would be a more surgical approach to assessing need than basing WSCP "triggers" off drought-like conditions in hydrologic regions, which ignores the central issue at hand: the ability of an agency to meet its customers' demands. Local agencies would determine whether they needed to implement their WSCP based on this annual assessment. If a shortfall were identified, the agency would report

what associated actions they would be taking to address the shortfall, and, if necessary, what demand-reduction stage (see below) it would need to invoke to bring demand in line with supply. The local agency would then provide monthly status reports until the supply insufficiency were addressed. The Reporting, Compliance, Enforcement branch would then monitor that agency, determine compliance, and offer support (or, eventually, whatever form of incentive “enforcement” entails).

DEMAND-REDUCTION STAGES: We would also encourage the state to consider, if not completely separate, the demand-reduction stages from the WSCP itself, or at least consider them as a corollary to the WSCP. Demand reduction is but one tool water agencies have at their disposal to address supply deficiencies, and the way the current framework is set up, these other tactics seem to be of secondary importance. Standardizing stage names across the state is fine, so long as local suppliers are able to determine when which stage is necessary, and how to achieve it. The state could compile a compendium of best management practices, from which agencies could determine which BMPs they instituted at what stage to achieve the associated reduction.

WSCP AS RESPONSE: We recognize the E.O. is primarily concerned with drought, but drought is not the only condition under which WSCPs are necessary, and it would be a lost opportunity to limit the context within which WSCPs function only to drought. That being said, the immediate cause of the water shortage is, in the short term, of lesser importance than how an agency responds to it, and a more general WSCP would be applicable to drought and any other scenario threatening one or more sources of supply. This lines up with the way we and other agencies are rethinking emergency response plans, which is to be less concerned with the cause of an emergency than with the response to its possible effects: reduced supply, contaminated supply, impaired distribution system, loss of power, and loss of communication.

WATER USE TARGETS

INDOOR TARGETS: Camrosa supports a standard indoor-water-use target based on empirical end-user studies. The improved efficiency of household appliances and fixtures, and the continually improving plumbing code, have demonstrated meaningful savings in indoor water use. It is reasonable to assume that these technologies and regulations will continue to bear fruit, and Camrosa recommends holding to the 55 GPCD standard for now, until future studies demonstrate the reasonableness of ratcheting that down. In the meantime, reducing indoor-water-use targets based on an arbitrary goal is counterproductive. See more on the potential implications of reduced indoor targets below, under Water Recycling.

IRRIGABLE AREA: Camrosa supports defining *irrigable* areas, rather than irrigated areas. Irrigable requires less frequent updates, as once an area is defined, a customer’s behavior—in response to drought or any other motivator—within that area doesn’t impact the budget. Smaller agencies like Camrosa could, with the state’s help, develop an initial analysis based on irrigable area, but they do not have the resources to support perpetual maintenance of their customers’ irrigated area.

CII: The wide range of water requirements in the CII sector, even within an agency of Camrosa's size, render straight percentage reductions impractical. The state should focus its efforts on developing, with industry participation, realistic BMPs applicable to various industry types, and local suppliers should focus their efforts on making reasonable efforts to have their CII customers implement BMPs.

WATER RECYCLING

In areas of the state that have progressive water-reuse systems, indoor demand reduction does not occur in isolation, and the state needs to consider the implications of reducing influent to treatment plants that produce recycled water for distribution to end-use irrigators. These systems were built and are being used and paid for by customers and ratepayers who made their investments under certain assumptions about the availability of recycled water. The State Water Board has water recycling goals that have translated into policy and regulatory frameworks across the state; while we certainly recognize that paradigms change over time, we hope at the very least that the state agencies developing the conservation regulations speak with their counterparts in water recycling about the potential unintended consequences of ratcheting down indoor water use too much with overly aggressive indoor GPCD targets, when there may be other ways to improve efficiency that do not damage an important and burgeoning sector of the state's water portfolio.

Camrosa runs and produces recycled water at a water reclamation facility, and diverts surface water from a creek composed primarily of wastewater effluent from a city above us on the watershed for delivery in a non-potable distribution system. We have precise measurements of the extent to which reduced indoor water use translates to reduced flows at wastewater treatment plants, both over time as conservation practices take hold and demand hardens (average flows in the creek have reduced 30 percent over the last ten years), and more acutely in response to drought (flows plummeted an additional 25 percent in 2015). The recycled water we deliver goes to residences, municipal systems, CII parcels, and agriculture. The vast majority of these users, including ag, transitioned off of (primarily State Water Project) potable water once the non-potable alternative became available. In other areas, non-potable supplies have offset pumping in a compromised portion of a CASGEM high-priority groundwater basin. For the recycled water users on these systems, reduced quantities of recycled water translate directly to increased demand for imported water and/or scarce groundwater. We therefore recommend that some consideration be given those areas that use the entirety of their recycled water(s), to safeguard the investments California citizens have made in reliability and reuse, and to protect against the creation of new potable demand by the reduction of existing potable demand.

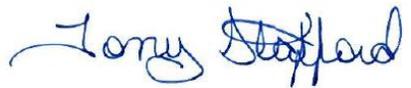
DROUGHT-RESILIENT SUPPLY

The state should continue to incentivize the development of local drought-resilient supplies by giving water agencies credit for such projects in both the WSCP process and the development of water targets/allocations. Doing so would provide the flexibility to accommodate the philosophies and lifestyles in which ratepayers have made significant investments over long

periods of time. In Camrosa's case, ratepayers have invested more than \$30 million over the last 20 years to develop non-potable and recycled water irrigation systems, improve groundwater production, and build a brackish groundwater desalination facility, all in order to determine for themselves how they use their water. That's their prerogative, and the state should make accommodations in the development of regulations that respect citizens' investment in self-reliance.

Thank you for your consideration of these comments. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Tony Stafford". The signature is written in a cursive style with a large, sweeping initial "T".

Tony Stafford
General Manager