

From: [Tenille Otero](#)
To: [Brostrom, Peter@DWR](mailto:Brostrom.Peter@DWR); [DWR Water Use Efficiency](#)
Subject: Comment Letter - Proposal to Implement Executive Order through Water Shortage Contingency Plans and Long-Term Water Use Targets
Date: Monday, September 19, 2016 9:46:58 PM
Attachments: [comment-letter-otay-2016_0919.pdf](#)

Dear Mr. Brostrom

Attached is the Otay Water District's comment letter regarding the proposal to implement the Governor's Executive Order through water shortage contingency plans and long-term water use targets. If you have any questions regarding Otay's comments and recommendations, please contact our General Manager Mark Watton at (619) 670-2210 or mwatton@otaywater.gov. Thank you for your time.

Tenille Otero
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September 19, 2016

Delivered by email to:

Peter.Brostrom@water.ca.gov

WUE@water.ca.gov

Mr. Peter Brostrom
Department of Water Resources
Water Use and Efficiency Branch
PO Box 942836
Sacramento, CA 94236-0001

Re: Comment Letter – Proposal to Implement Executive Order through Water Shortage Contingency Plans and Long-Term Water Use Targets

Dear Mr. Brostrom

The Otay Water District (Otay) appreciates the opportunity to provide comments on the development of the framework for setting water use targets based on the four target areas specified in Directive 2 of the Governor's Executive Order B-37-16. Otay serves more than 220,000 customers in the communities of Otay Mesa, Chula Vista, Jamul, Spring Valley, Rancho San Diego, and unincorporated areas in southeastern San Diego County, California. Through Otay's conservation efforts, customers exceeded the State's mandated 20 percent target set in May 2015, averaging 22 percent from June 2015 through January 2016, compared to the State's 2013 baseline. Beginning in February 2016, the State reduced Otay's conservation target to 12 percent. As a result, Otay's potable water use decreased by 19 percent from June 2015 through August 2016, beating the State's targets. Otay continues to encourage efficient water use among our customers, and continues to invest in local, drought-resilient supplies.

Otay is in concert with the comments submitted to the State by our wholesale supplier, the San Diego County Water Authority (Water Authority), in a comment letter dated Sept. 15, 2016.

The framework on the proposed complex, long-term water use targets was very recently released by the State, and given that all aspects of the four proposed target areas have substantial impacts on retail agencies and the recovering economy, there is potential to hinder the development of future local, sustainable supplies.

We recommend that the State slow down the process considerably to ensure sufficient time to evaluate the current studies being conducted by the State. This time is needed to test the proposed standards for each of the four sector budgets and to make modifications as needed. Due to the complexity of this issue, we need adequate time to provide input and to develop a policy. The proposed framework should provide a broad policy outline that describes the approach to calculating the new water use targets, to pilot test the proposed target-setting methodology with water suppliers, and incorporate necessary refinements. Details should be determined based on the studies and testing. We are concerned that the State's present schedule does not allow for this time.

Thank you for the opportunity to provide our comments and recommendations on this significant and complex issue. I am happy to address any questions related to Otay's comments and recommendations. Please feel free to contact me at 619-670-2210, or mwatton@otaywater.gov

Sincerely,



Mark Watton
General Manager
Otay Water District