

December 19, 2016

The Honorable Felicia Marcus, Chair
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

The Honorable Mark Cowin, Director
California Department of Water Resources
P.O. Box 942836, Room 1115-1
Sacramento, CA 94236-0001

SUBJECT: Comments on "Making Conservation a Way of Life" November 2016 Public Review Draft

Dear Chair Marcus and Director Cowin:

The undersigned water agencies are also signatories to the ACWA Comment Letter signed by more than 100 water suppliers and associations. We wish expand on the comments in the ACWA letter on three points. We look forward to resolution to these supplemental concerns and are willing to work collaboratively with the Executive Order agencies as the Framework implementation of the Executive Order B 37-16 is refined.

We have the following supplemental concerns:

1. Alternative Target-setting Approach (Sections 3.1.1 and 3.1.2)

To expand upon the request for an alternative target setting approach in the ACWA letter, we believe alternatives such as what are provided in SB x7-7, and in particular that a specific percentage reduction by a date certain (such as a baseline to achieve 20% by 2020), would be much more straightforward, clearly understood by the public, and would build upon consensus-based law already in place. Understanding and acceptance of a conservation standard by the public is the key to the Governor's goal of making conservation a way of life.

2. Implementation of Proposed Targets (Section 3.1.3)

If compelled to apply strictly a budget-based approach to target-setting, the State must provide detailed and accurate landscape data to water agencies on a parcel-by-parcel basis. We have concerns that the irrigated land and vegetation aerial imagery the State proposes to collect by 2018 will be susceptible to variations in accuracy given specific site conditions, including steep topography and thick native tree cover in the Sierra Foothills that obscures outdoor landscapes and structures to a degree that ground-truthing would be necessary. In order for local agencies to verify outdoor landscape area targets are accurate, staff would need to make field visits to customers' private properties, which would pose a significant safety risk to our personnel. We would also need to educate our customers regarding the new targets, which could only be done effectively on a customer-by-customer basis. For this landscape data verification and customer outreach to be successful, it will take significant staff time and resources that are already spread thin, or nearly non-existent. Should the current proposal become law, we urge the State to include a funding mechanism to cover the costs incurred as part of the implementation of these

new mandates. Even with financial assistance from the State, assuming that urban water agencies receive detailed landscape data by the end of 2018, setting targets by 2020 provides two years or less to verify actual site conditions and finalize water targets. We do not believe this is enough time to safely meet with customers to verify landscapes, evaluate the target standards, provide adjusted data to the State and obtain refined targets


3. Financial Constraints (Section 4.3)

Water conservation and investments in efficiencies have come at a significant financial expense to Amador Water Agency, Calaveras County Water District and other rural water agencies that qualify as Urban Water Suppliers. While these efforts are an important part of our agencies' ongoing investment in a suite of integrated projects and programs to enhance water supply reliability for the communities we serve, they are, as the Governor's own comprehensive water action plan recognizes, only one of many actions that must be taken to ensure the continuous delivery of safe, reliable water to our customers now and in the future. The cost to provide water service to smaller customer bases spread over greater distances is challenging. This is further compounded by the fact that many of the rural communities we serve are economically distressed. Without additional financial assistance from the State to help accomplish the goals of the new conservation framework, our water agencies may be forced to reallocate limited resources away from other critically important efforts. We urge the State to prioritize the allocation of additional financial and technical assistance to those agencies that do not have the means either through reallocating existing funds or raising additional revenue to pay for the new requirements.

Thank you for the opportunity to comment. We look forward to continued collaboration with staff of the State agencies to develop a framework by the January 2017 deadline that meets the objectives of the EO while preserving local water supplier authority and providing flexibility in implementation.

Sincerely,

Amador Water Agency



Gene Mancebo
General Manager

Calaveras County Water District



Dave Eggerton
General Manager

Cc:

The Honorable Frances Spivy-Weber, Vice Chair, State Water Resources Control Board

The Honorable Dorene D'Adamo, Member, State Water Resources Control Board

The Honorable Steven Moore, Member, State Water Resources Control Board

The Honorable Tam Doduc, Member, State Water Resources Control Board

Ms. Kim Craig, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown Jr.

Mr. Tom Howard, Executive Director, State Water Resources Control Board

Mr. Eric Oppenheimer, Chief Deputy Director, State Water Resources Control Board

Mr. Gary B. Bardini, Deputy Director, Integrated Water Management, Department of Water Resources

Mr. Kamyar Guivetchi, Manager, Statewide Integrated Water Management, Department of Water Resources