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Division 4

Jim Abercrombie
General Manager

Thomas D. Cumpston
General Counsel

In reply refer to: M0117-002

January 12, 2017

VIA EMAIL TO commentletters@waterboards.ca.gov

Felicia Marcus, Chair
and State Water Resources Control Board (SWRCB)
1001 I Street
Sacramento, CA 95814

Attn: Jeanine Townsend, Clerk to the Board

Re: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus and Board Members D'Adamo, Doduc, Moore, and Spivey-Weber:

Thank you for scheduling the forthcoming January 18 public workshop to solicit input on potential adjustments to the May 2016 Emergency Regulation in response to precipitation levels and other drought indicators across the State since May 2016.

Similar to our previous comment letter last year, the District implores the SWRCB to rescind the Emergency Conservation Regulation or simply let it expire in February.

Last winter's favorable precipitation and snowpack returned our water supplies to normal conditions. As a result, in May 2016 the El Dorado Irrigation District (EID) Board adopted a resolution that rescinded the District's own declared drought emergency and removed the Stage 2 drought conservation measures that were in continuous effect since February 2014.

In June 2016, the District self-certified that it had sufficient water supplies for another three years should drought conditions continue, resulting in a 0% conservation standard. Even so, our customers have continued to conserve and be water efficient. Since February 2014, when our local drought declaration went into effect, our customers have conserved 26% compared to pre-drought usage. The District exceeded the 28% conservation mandate the SWRCB assigned it for 2015 and 2016. Since the District's drought declaration was rescinded in May 2016, our customers have continued to conserve at a 21% clip compared with 2013 usage.



So far this winter, El Dorado County has been deluged with large amounts of precipitation.

- Our primary water supply reservoir, Jenkinson Lake, began spilling on January 4, more than two months earlier than normal.
- Our Weber Reservoir is full and spilling.
- All reservoirs in our combined water-supply/hydroelectric project, FERC Project 184, are projected to fill and spill this year. Recently we have had to implement various flood-control measures at our facilities, including increased releases from Caples Lake to evacuate stored water to make room for additional inflow and snowmelt.
- We also draw a small portion of our supplies from Folsom Reservoir, where storage is currently 128 percent of average for this time of the year and flood-control releases are ongoing. Assuming prudent dam operations, it seems certain to fill this year.

The drought has long been over for El Dorado Irrigation District. We believe the same can be said for the 84% of the water suppliers in the State who submitted self-certification results with a 0% conservation standard.

We recognize that there remain limited areas in California where drought conditions are still in effect. We therefore advocate that the SWRCB focus its assistance on those areas in meeting their water needs and conservation requirements. However, where drought conditions have ceased to exist like at EID, we urge the State Water Board to rescind the emergency conservation regulation completely or let it expire in February, and restore local control.

To prepare for the possibility of another dry winter, Executive Order B-37-16 required the Board to develop a proposal to achieve a mandatory reduction in potable water use that builds off the mandatory 25 percent reduction in previous Executive Orders and lessons learned through 2016. In light of current hydrologic conditions, there is no justification to consider a return to mandatory conservation targets on a statewide basis. EID has sent a letter to Governor Brown urging him to rescind this portion of the Executive Order.



Felicia Marcus
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Thank you for considering the District's comments.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Thomas D. Cumpston', is written over the printed name.

Thomas D. Cumpston
Acting General Manager

TDC:pj

cc: EID Board of Directors
Jim Abercrombie, EID General Manager
Brian Poulsen, EID General Counsel
Brian Mueller, EID Director of Engineering