

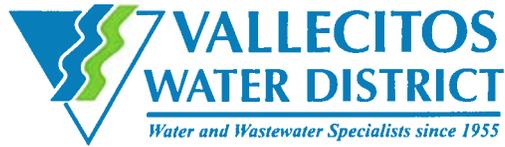
**From:** [Chris Robbins](#)  
**To:** [DWR Water Use Efficiency; commentletters](#)  
**Subject:** VWD Comments on the Proposal to Implement Executive Order through Long-Term Water Use Efficiency Framework  
**Date:** Friday, October 7, 2016 11:04:33 AM  
**Attachments:** [Scanned from a Xerox Multifunction Device.pdf](#)

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Attached are comments from the Vallecitos Water District.

Chris

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October 7, 2016

California Department of Water Resources Attn: Peter Brostrom  
Water Use Efficiency Program Manager  
901 P Street  
Sacramento, CA 95814

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

Delivered via email to: [wue@water.ca.gov](mailto:wue@water.ca.gov) ; [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

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

Dear Mr. Brostrom and Ms. Townsend:

On behalf of the Vallecitos 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 to express our concern over hastily establishing permanent regulations. If not done right, these regulations have the potential to threaten California's quality of life, stifle the state's economy, and drastically increase water rates throughout the state.

Urban water agencies were active throughout the process of drafting SB X7-7 and we believe that current efforts should also follow a legislative process similar to SB X7-7 to ensure that they are fully vetted and satisfy statewide objectives in a fair and reasonable manner.

The current timeline does not provide the general public adequate opportunity to review the public draft report and provide comment outside of a short ten day window in November. The release of the draft report on Friday, November 4th with comments due on Monday, November 14th allows only four business days for comments to be developed and submitted on regulations which will permanently change water use in California.

Additionally, it is unclear as to how the public is expected to learn about the public review draft which will be released on November 4th. To date, water agencies and

non-governmental organizations have been relied upon for input. We are concerned that the public at large, including businesses which will be affected, are not aware of this process, the reasoning behind it, nor the financial long term impacts these regulations will have on California. Any regulations that place restrictions on commercial and industrial customers should carefully consider the statewide economic ramifications and allow an opportunity for all voices to be heard.

Further, in response to the proposals presented on September 6, 2016, in Oakland, and on September 8, 2016, in Los Angeles, the District notes there is a lack of consideration for the development of new water supplies. The District has invested heavily in the development of desalinated water supplies. Our customers will expect to reap the benefits of this investment.

The District also strongly suggests that you consider issuing the framework by January 2017, but extend the deadline for the development of these permanent requirements to allow for adequate feedback and adjustments to the framework that will affect how water is used throughout California for years to come.

Finally, it is imperative that the state not remove the ability and authority of local water agencies to manage water in their respective service areas; these agencies are best suited to determine and respond to actual supply and demand conditions, understand customer water use patterns, and determine the appropriateness and effectiveness of contingency plans and efficiency programs in their respective service areas. In a state as large as California, one size will not fit all when it comes to drought response or measures to achieve water reductions. Thank you for your consideration of our concerns in advance of your October 20th, 2016 meeting.

We hope our comments are helpful. In the meantime, we continue to take action on many levels to promote long-term water use efficiency. Please contact Chris Robbins at (760) 752-7120 or [crobbins@vwd.org](mailto:crobbins@vwd.org) with any questions or for additional information related to the District's comments and recommendations.

Sincerely,



Tom Scaglione  
Interim General Manager