



NEWHALL COUNTY WATER DISTRICT

23780 North Pine Street • P.O. Box 220970 • Santa Clarita, CA 91322-0970
(661) 259-3610 Phone • (661) 259-9673 Fax • email: mail@ncwd.org

Directors: B. J. ATKINS, *President* MARIA GUTZEIT, *Vice President* KATHY COLLEY DANIEL MORTENSEN LYNNE A. PLAMBECK

April 21, 2015

Jessica Bean, Engineering Geologist
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814

Attn: Jessica Bean
Via Email Only

Subject: Comment Letter 2 – Mandatory Conservation Achieving a 25% Statewide Reduction in Potable Urban Water Use Fact Sheet

Dear Ms. Bean:

The Newhall County Water District (NCWD) appreciates the opportunity to provide additional comments on the State Water Resources Control Board (State Water Board) most recent Mandatory Conservation Fact Sheet dated April 18, 2015. NCWD has been actively engaged in water conservation efforts and has been implementing the required mandatory actions. We understand and appreciate the expedited timeline and pressure the State Board is faced with and we have kept our comments concise. If the State Board has any questions, we can provide additional data and information as needed. To that end, NCWD respectfully submits the following comments:

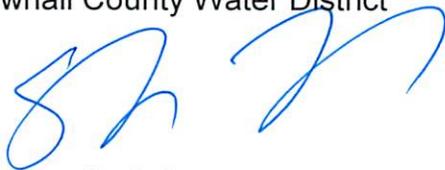
1. Although the State Water Board has adjusted how it is reporting the R-GPCD, we have two additional comments:
 - a. NCWD appreciates the State Water Board's acceptance of water supplier's revised numbers and looks forward to the updated R-GPCD calculations and reduction tiers.
 - b. NCWD believes the average calculation should not include numbers prior to the Governor's "Voluntary Conservation" actions of 2014. A more fair and appropriate average should include *all* data reported from the August 1, 2014

when the State Water Board adopted the first set of water conservation measures through April 1, 2015 when the Governor issued the most recent Mandatory Conservation measures.

2. NCWD would like to have a clear definition of the R-GPCD calculation. We have spoken with several other water suppliers and many have differing interpretations of the formula.
3. Since the State Water Board is a proponent of a water rate structure which includes **Water Budgets**, then the R-GPCD should include a “climate adjuster” in the calculation. The generally accepted water budget calculation includes a factor for evapotranspiration.
4. In order to create consistency within the various communities in the State, NCWD would like to see a **“regional compliance option.”** The water suppliers in the Santa Clarita Valley have done a tremendous amount of work preparing and implementing an integrated regional water supply strategy. It would be extremely confusing to the community if each water supplier was required to meet different goals.

NCWD looks forward to continuing to work with the State Water Board to ensure we not only meet short term goals, but also address the development of a framework to discuss the advancement of long term water reliability policy.

Sincerely,
Newhall County Water District



Stephen L. Cole
General Manager