



San Diego County Water Authority

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December 11, 2016

Randy Record and
Members of the Board
Metropolitan Water District of Southern California
P. O. Box 54153
Los Angeles, CA 90054-0153

MEMBER AGENCIES

- Carlsbad Municipal Water District
- City of Del Mar
- City of Escondido
- City of National City
- City of Oceanside
- City of Poway
- City of San Diego
- Fallbrook Public Utility District
- Helix Water District
- Lakeside Water District
- Olivenhain Municipal Water District
- Otay Water District
- Padre Dam Municipal Water District
- Camp Pendleton Marine Corps Base
- Rainbow Municipal Water District
- Ramona Municipal Water District
- Rincon del Diablo Municipal Water District
- San Dieguito Water District
- Santa Fe Irrigation District
- South Bay Irrigation District
- Vallecitos Water District
- Valley Center Municipal Water District
- Vista Irrigation District
- Yuima Municipal Water District

RE: Board Memo 8-7 – Adopt CEQA determination and adopt Legislative Priorities for 2017/18

Dear Chairman Record and MWD Board Members,

We have reviewed Board Memo 8-7 on proposed legislative priorities for 2017/18 and provide the following observations, questions and recommendations. On a housekeeping matter, it would be helpful when reviewing updates such as this if staff would provide a redline copy of the document being updated. Also, on a general note, many of the items are quite broad in nature; we trust that staff will bring back specific legislation and regulatory measures as they develop. We also assume all recommendations are made in a context of full compliance with California law and the state constitution.

Under *Regional Water Resources Management*, a new priority to “support using water more wisely in both urban and agricultural settings and strengthening local drought contingency planning” was added. The intent of this new addition is unclear; moreover, while we of course support using water wisely, the statement that we should support using water more wisely suggests that water has not been used wisely in the past (or that MWD did not formerly support wise water use). Such a statement runs counter to the Water Authority (and presumably MWD’s) data that confirms progressively substantial reductions in per capital water use. This statement could also be misunderstood in the context of the State Board’s current process for establishing long-term drought regulations.

In the same section, the second bullet should be edited to delete the words highlighted in red and add those in blue to express this objective in a manner that is consistent with California law:

OTHER REPRESENTATIVE

County of San Diego

Support administrative/legislative action to promote the development of recycled water (including indirect and direct potable reuse), stormwater, and desalination projects as water resources, without compromising the operational, ~~financial, and~~ water quality, ~~regulatory and customer~~ interests of Metropolitan and other water and wastewater agencies.

Under *Energy Sustainability*, a new priority to “support efforts to ensure power costs to the

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State Water Project and Metropolitan are appropriate and proportional to the benefits received and that operations of the Colorado River Aqueduct are not adversely impacted,” was added. This is a good addition; under California law and the state constitution, cost of service and proportionality requirements apply to energy costs, just as they do to water supply costs.

Under *Federal Appropriations Priorities*, given the importance of addressing the Salton Sea in the coming year, we recommend the addition of this priority:

- Federal authorization and appropriation of funds to implement Salton Sea restoration solutions in partnership with state and local entities.

Under *Environmental Planning and Environmental Compliance*, we recommend the following addition:

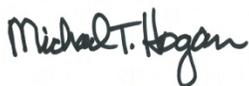
- Oppose the mandated reduction of wastewater discharges to the ocean absent inclusion of funding to offset the significant costs of implementation.

Under *Drought Related Legislation*, and using lessons learned from the current drought, we recommend the following addition:

- Support legislative efforts which recognize variations among communities, regions, and counties with respect to the capability of withstanding the impacts of drought, and that ensure that any statutory or regulatory direction for improving water use efficiency is fact-based and not a one-size-fits-all approach.

We look forward to discussing our comments with you at the Communications and Legislation Committee.

Sincerely,



Michael T. Hogan
Director



Keith Lewinger
Director



Elsa Saxod
Director



Fern Steiner
Director