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PALMDALE WATER DISTRICT

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January 28, 2016

Ms. Jeanie Townsend, Clerk of the Board and
Mr. Tom Howard, Executive Director
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

RE: COMMENTS ON PROPOSED REGULATORY FRAMEWORK FOR EXTENDED EMERGENCY REGULATION FOR URBAN WATER CONSERVATION

Dear Ms. Townsend and Mr. Howard:

On behalf of Palmdale Water District (PWD), thank you for the opportunity to provide comment on the proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation. PWD fully understands and appreciates the importance of water use reductions as necessary to address the ongoing drought in California and has long continued to promote the need for water conservation as a way of life through education and multiple programs such as cash for grass, rebates, and watering restrictions.

PWD welcomes the SWRCB's consideration of the climate based adjustment proposal of 4 percentage points based on evapotranspiration (ET) as we are located in the high desert of Southern California and fall under ET Zone 14. PWD embraced the conservation goals set forth in SBX7-7 in 2008 and achieved the 20% reduction by 2020 goal in 2010. Our customers made great effort in accomplishing this benchmark early on as the District aggressively embarked on various innovative conservation programs, rate structures and educational promotions to achieve water demand reductions near 29% at that time.

Unfortunately, PWD's 2013 and 2014 GPCD and production quantities used by the SWRCB for benchmark reductions under the current drought emergency measures had already been hardened well below the SBX7-7 2020 target and left little room for further conservation. In spite of this disadvantage, PWD's customers made great strides in water reductions realizing a GPCD level 20% lower on average than our neighboring agencies who having identical demographics and climate and continue to struggle to meet the mandated goals set forth under the current emergency regulations.



Providing high quality water to our current and future customers at a reasonable cost.



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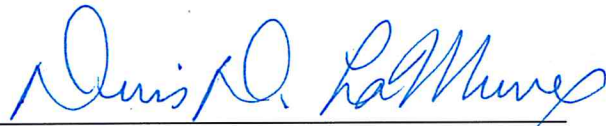
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Our concern is that the baseline chosen by the State doesn't acknowledge previous conservation reductions or give credit for actions previously taken by our customers to be good stewards of this precious resource effectively penalizing our customers while their immediate neighbors are rewarded with greater quantities of water for more flexible outdoor use.

PWD would further petition that along with adopting the climate based adjustments, the SWRCB continue its policy of tracking water agency compliance since June, 2015 with an additional provision of making the climate based adjustment retroactive to the June, 2015 date.

Thank you again for the opportunity to comment on the regulatory framework for Extended Emergency Regulation and your consideration of our request.

Very truly yours,



DENNIS D. LaMOREAUX,
General Manager

JMP/DDD/dd