

Comment Letters

From: Paul Maselbas [mailto:pmaselbas@dpw.lacounty.gov]
Sent: Wednesday, January 06, 2016 4:42 PM
To: Frevert, Kathy@Waterboards
Cc: Adam Ariki; Carolina Hernandez; Robert Cadena; Gloria Dean
Subject: Comments on Proposed Regulatory Framework

Hi, Kathy –

The Los Angeles County Department of Public Works, Waterworks Division, oversees the Los Angeles County Waterworks Districts. We have the following comments regarding the proposed framework.

1. The Los Angeles County Waterworks Districts support the Climate Adjustment credit and the consideration of evapotranspiration relative to the statewide average.
2. The Districts request that the SWRCB consider the implementation of credits for suppliers in high fire danger area zones as designated by the State of California.

Thank you for your consideration of these comments.

- Paul

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From: CSG Notice <csgnotice@csgcalifornia.com>
Date: December 22, 2015 at 2:42:41 PM PST
To: <almartinez@dpw.lacounty.gov>
Subject: CSG Notice: SWRCB Releases Proposed Extended Emergency Regulatory

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Framework for Urban Water Conservation

Reply-To: CSG Notice <csgnotice@csgcalifornia.com>



**SWRCB Releases Proposed Extended Emergency Regulatory
Framework for Urban Water Conservation
*Tuesday, December 22, 2015***

The State Water Resources Control Board (SWRCB) has released its [Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation](#) (Proposed Regulatory Framework). SWRCB adopted the original Emergency Regulation in May 2015 in compliance with an executive order given by Governor Brown in April 2015. The Emergency Regulation currently in place mandates a 25% statewide reduction in potable urban water use between June 2015 and February 2016.

In November 2015, the Governor issued an executive order to extend the Emergency Regulation until October 31, 2016 if drought conditions persist until January 2016. Since then, SWRCB staff have worked with stakeholders to develop recommended modifications to the existing Emergency Regulations. Some of the changes that they suggest in the Proposed Regulatory Framework include:

- A climate adjustment that would reduce conservation requirements by up to 4 percentage points for water suppliers that are located in warmer regions of the state.
- A growth adjustment that would change conservation standards in consideration of water efficient growth since 2013.

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- Inclusion of a supply credit for water suppliers that use drought resilient sources of water for at least 4% of their potable supply.
- Modification of the Commercial Agriculture Exclusion that requires certification that customers using the exclusion produce at least \$1,000 in revenue from agricultural sales yearly.

In order to achieve the Governor's statewide reduction targets, the original Emergency Regulation assigned each urban water supplier a conservation standard between 4 and 36 percent based on their residential water use between July and September 2014. In the Proposed Regulatory Framework, staff suggests to cap the amount of credits and adjustments that an individual water supplier is able to receive at 4 percentage points.

SWRCB is accepting comments on the new Proposed Extended Emergency Regulatory Framework until January 6, 2016. Comments can be submitted to:

kathy.frevert@waterboards.ca.gov with "Comments on Proposed Regulatory Framework" in the subject line. SWRCB anticipates releasing a draft Emergency Regulation in mid-January for public comment, and expects to consider adopting the Emergency Regulation in early February.

More information regarding SWRCB's Emergency Conservation Regulation is available [here](#).

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