



CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION

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Sent via email: commentletters@waterboards.ca.gov

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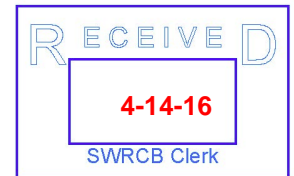
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April 14, 2016

The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Re: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus and Members of the Board:

The California Municipal Utilities Association (CMUA), representing publicly-owned electric utilities and 40 water agency members that deliver water to over 70% of Californians, appreciates the opportunity to comment on possible revisions to the State Water Resources Control Board (State Board)'s Extended Emergency Water Conservation Regulation (Emergency Regulation).

CMUA offers the following responses to the specific questions posed in the meeting notice distributed by the State Board:

What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?

Just as the State Board strengthened the restrictions as the drought worsened, it is appropriate to rescind the Emergency Regulation given favorable winter precipitation and snowpack conditions, particularly in the state's upper watersheds. The impacts of the drought emergency have been substantially alleviated and rescinding the Emergency Regulation now will help the

Administration and water suppliers maintain credibility when communicating conservation messages with Californians. It also will ensure that, should emergency drought conditions re-emerge, users are again ready and willing to take extraordinary steps to conserve water.

Should the State Board determine that the Emergency Regulation must be continued until October, CMUA supports a simple formula for reducing individual water supplier conservation standards, recognizing local and regional supply conditions including source watersheds and all supplies available to an agency.

Additionally, to help address concerns regarding another dry winter, CMUA supports voluntary water use reductions and continued implementation through October of End User Requirements in Promotion of Water Conservation, outlined in Section 864 of the Emergency Regulation.

How should the State Water Board account for regional differences in precipitation and lingering drought impacts, and what would be the methods of doing so?

As noted above, California's source watersheds are a key component of the state's water supply portfolio. In fact, more than 60 percent of California's developed water supply originates in the Sierra Nevada serving end users throughout the state including much of Southern California. Water suppliers also have implemented water recycling, desalination, and other local or regional projects. As a result, regional differences in precipitation have varying impacts on actual water supply conditions and these differences should be weighed carefully by the State Water Board in light of these factors.

To what extent should the State Water Board consider the reliability of urban water supplier supply portfolios in this emergency regulation?

CMUA members continue to develop and implement projects that enhance their water supply portfolios and help ensure water supply reliability, including during times of drought. These investments should be recognized by the State Board as they consider rescinding or revising the Emergency Regulation. However, the State Board should not evaluate the reliability of water suppliers' supply portfolios in the Emergency Regulation.

Conclusion

Thank you for considering CMUA's comments and for engaging stakeholders throughout the development of the Emergency Regulation and the extension of the Emergency Rule. CMUA supports Governor Brown and the State Board's efforts to manage the state's multi-year drought including establishing requirements that are intended to address emergency conditions. However, those

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emergency conditions have been substantially alleviated by this winter's precipitation and snowpack and CMUA urges the State Board to withdraw the Emergency Regulation at this time. Please contact me at 916-326-5800 or dblacet@cmua.org should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Danielle Blacet', written in a cursive style.

Danielle Blacet

Director for Water

cc: Tom Howard, Executive Director, State Water Resources Control Board
Eric Oppenheimer, Chief Deputy Director, State Water Resources Control Board
Max Gomberg, Climate Change Mitigation Strategist, State Water Resources Control Board