



January 5, 2016

Ms. Kathy Frevert
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814

Attn: Kathy.Frevert@waterboards.ca.gov
Via Email

Subject: Comments on Proposed Regulatory Framework

Dear Ms. Frevert:

The Castaic Lake Water Agency appreciates this opportunity to comment on staff's recommendations to the State Water Resources Control Board for modification of the existing Emergency Regulation for Statewide Urban Water Conservation (Emergency Regulation). Castaic Lake Water Agency provides supplemental imported water to the Santa Clarita Valley and operates Santa Clarita Water Division, which provides retail water service to a population of approximately 121,700.

We would like to express our support for the following three adjustments:

Growth Adjustment – To provide a mechanism to adjust urban water supplier conservation standards to account for water efficient growth since 2013.

Climate Adjustment – To incorporate a climate adjustment in the Emergency Regulation that reduces the conservation requirement for water suppliers located in the warmest regions of the state.

Multiple Adjustments – When final modifications are adopted, we recommend that provisions be made for water retailers that may be affected by both recent growth and warmer than average climate such that the reductions are not capped at four percent total.

Additionally, we wish to voice support for a prohibition against homeowners' associations interfering with conservation actions of their members in violation of existing law. The Santa Clarita Valley has almost 200 homeowners' associations, which vary in their attitudes towards conservation. Our efforts working with homeowners associations in the Santa Clarita Valley would be strengthened with a prohibition against interference with conservation actions.

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We appreciate the opportunity to provide these comments.

Sincerely,


Matthew G. Stone
General Manager