

Felicia Marcus, Chair State Water Resources Control Board c/o Jeanine Townsend, Clerk to the Board 1001 I Street, 24th floor Sacramento, CA 95814 **Board of Directors**

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General Manager
Tony L. Stafford



May 13, 2016

Dear Ms. Marcus:

Thank you for the opportunity to comment on the State Water Board staff proposal for extended emergency regulation for urban water conservation.

It is apparent that the Board has heard the concerns of local agencies over the past eleven months regarding these regulations. Camrosa appreciates the latitude this latest draft of extended regulations gives local agencies to develop policies to manage their resources in times of drought in ways that make sense within local contexts. In addition, we support the continuance of various restrictions on water use that Camrosa has already put in place, including prohibiting runoff, mandating shutoff nozzles for hoses, and requiring re-circulated water for fountains and other decorative water features.

In the proposed extended regulation, we specifically support Section 864.5, which separates urban water wholesalers' projections of imported water availability from that of local agencies' alternative/additional supplies. This makes particular sense in Camrosa's case, as we have invested more than \$30 million of our ratepayers' money over the last 20 years building infrastructure and forming regional partnerships to increase our self-reliance. Some of that \$30 million has come from the state via Proposition 84, as well as from the Metropolitan Water District via its Local Resource Program. That the draft extended regulations accommodate local resources is both an acknowledgment of these investments and an affirmation of the state's purpose in funding such initiatives.

We urge the Board to preserve the distinction that staff's proposal makes between imported wholesale supplies and local alternative resources, in order to leave such policy decisions to local resource managers.

Thank you again for the opportunity to submit input. I'm happy to answer any questions you, the Board, or staff might have about these comments.

Sincerely,

Tony Stafford, General Manager