



December 31, 2015

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Sacramento Municipal Utility  
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Sacramento Regional County  
Sanitation District  
Sacramento Area Flood  
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Ms. Kathy Frevert  
State Water Resources Control Board  
Via email: [Kathy.Frevert@waterboards.ca.gov](mailto:Kathy.Frevert@waterboards.ca.gov)

Re: Comments on Proposed Regulatory Framework

We are pleased to provide comments on the State Water Resources Control Board (State Water Board) staff's *Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation*. We appreciate the efforts of staff and the State Water Board to follow through on the commitment to consider changes to the emergency regulation adopted in May 2015. Thoughtful consideration was given to a number of proposals brought forth by water agencies and other stakeholders.

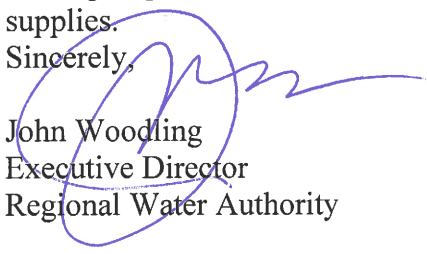
The Regional Water Authority (RWA) represents 22 water suppliers serving two million people in the greater Sacramento region. Collectively, RWA members reduced water use more than 30% in 2015. That reduction did not come without the significant financial and aesthetic burden of lost landscapes, including damage to our urban forests. We support the State Water Board staff proposal to add a climate adjustment into extended emergency regulations. This modification recognizes the greater burden that was placed on residents of California's inland areas, and provides a modest level of relief.

In addition to urging the Board to adopt the climate adjustment proposal, we encourage staff and the Board to explicitly address the need to reconsider the extended emergency regulations in April 2016 based on hydrologic conditions. Sierra snowpack, storage in the State's major reservoirs, projected runoff, cumulative precipitation, available local water supplies, and other factors can be used to assess the extent to which ongoing drought represents an "emergency" statewide and in each region. Residents throughout California stepped up to meet the Governor's 2015 call for a 25% reduction in water use. Continuing to expect these sacrifices without clear and convincing evidence of an ongoing emergency will reduce the public's trust in state and local agencies and hinder both short and long term achievement of water conservation and efficiency goals.

Letter to Ms. Kathy Frevert  
State Water Resources Control Board  
December 31, 2015  
Re: Comments on Proposed Regulatory Framework

In summary, we commend the State Water Board and staff for their efforts. We urge the State Water Board to adopt staff's climate adjustment proposal and to commit to a robust evaluation of the ongoing need for emergency measures in April 2016, based on an assessment of water supplies.

Sincerely,



John Woodling  
Executive Director  
Regional Water Authority