



April 14, 2016

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

Subject: Comment Letter–Urban Water Conservation Workshop

Dear Chair Marcus and State Water Resources Control Board Members:

The Santa Clara Valley Water District (District) appreciates the opportunity to provide input and recommendations for the State Water Resources Control Board's (State Water Board) consideration regarding modification of the Emergency Regulation.

As the primary water resources and groundwater management agency for the nearly 2 million residents and wholesaler to 13 urban water suppliers of Santa Clara County, the District strongly supported the efforts of the State Water Board in establishing the Emergency Regulations as it has complemented and supported our local efforts. On November 24, 2015, the District Board of Directors extended our call for a 30 percent reduction through June 30, 2016. Although water supply conditions have improved in 2016, we anticipate we will continue to call for short-term reductions throughout 2016.

We offer the following comments for your consideration in response to the questions that were posed.

**1. Continue With the Emergency Regulation During a Governor Declared Drought Emergency, with Modifications**

The District recommends the State Water Board continue with the Emergency Regulation, including a statewide conservation mandate, the prohibition of specific water uses, and the requirement of monthly reporting, while a statewide, governor declared drought emergency is in place. However, rather than a tiered system based on an urban water agency's gallons per capita per day, the District recommends an urban water agency's standard be based on local conditions. For instance, an urban water agency would be able to self-certify based on projections of local demands and supply, including the status of reserves and groundwater conditions. Agencies will be required to provide the necessary documentation to State Water Board staff to verify the self-certification. If an urban water agency elects to not self-certify, their standard would default to an adopted State mandate.



## 2. Promote Recycled Water Development

The State Water Board should continue its efforts to promote the expanded use of recycled water, both non-potable reuse and potable reuse. Although recycled water development is outside of the scope of the Emergency Regulation, continued State efforts are necessary to expedite projects that are in development during the existing drought and projects that will create resilience to future drought conditions. The drought is stretching resources at the state, regional, and local levels, but we must continue our efforts to invest in developing local and regional supplies that increase drought resilience and adapt to climate change.

The District is committed to continuing to work with the State, regional partners, and our local community to continue to implement effective drought response strategies, increase long-term water conservation savings, and develop new supplies that are drought resilient in a changing climate.

Sincerely,



Norma J. Camacho  
Interim Chief Executive Officer

cc: J. Fiedler, G. Hall, R. Callender

