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February 6, 2017

Delivered via email: commentletters@waterboards.ca.gov

The Honorable Felicia Marcus, Chair
and Members of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

**Re: February 8, 2017 Board Meeting – Item No. 9, Proposed
Extension and Modification of Emergency Regulation**

Dear Chair Marcus and Members of the Board:

Thank you for the opportunity to provide additional input on the potential extension and modification of the current Emergency Regulation for Statewide Urban Water Conservation. Las Virgenes Municipal Water District (District) maintains its position that the State Water Resources Control Board should allow the Emergency Regulation to expire on February 28, 2017, without further extension.

The recent, dramatic and visible improvements in hydrologic conditions statewide no longer support the need for the Emergency Regulation. Precipitation, snowpack and reservoir storage data (see attached) indicate that California is likely to end the season with one of the wettest years on record. The statewide snowpack water content is already at 116% of average April 1st levels, with the Southern Sierra Nevada leading the way at 127%. The 5- and 8-Station Indexes of precipitation are at 112% and 115%, respectively, of average October 1st levels. Reservoir storage currently exceeds 18.5 million acre-feet, which is 110% of average for this time year, requiring flood control releases from many major dams. Meanwhile, atmospheric river conditions continue to dominate the weather pattern, bringing additional rain and snow to California.

Although the staff report for Item No. 9 correctly notes that the “full picture of the state’s hydrologic water conditions for 2016/2017 remains unclear”, it would be disingenuous to suggest that the year could be categorized in any sense as a dry winter, which was the condition outlined in Governor

The Honorable Felicia Marcus, Chair, and Members of the Board
February 6, 2017
Page 2

Brown's Executive Order B-37-16 for extending and modifying the Emergency Regulations. Further, the staff report states "*some reservoirs remain critically low and groundwater storage remains depleted in many areas due to the continued impact of prolonged drought.*" Although we acknowledge that Lake Cachuma in Santa Barbara County remains critically low, the majority of the state's reservoirs are well above average levels and many are temporarily encroached, requiring flood control releases.

With regard to the depletion of groundwater storage, we recognize that this issue remains a major statewide challenge; however, the condition is not the result of the current drought nor will it be resolved through extension of the proposed Emergency Regulation. Implementation of the Sustainable Groundwater Management Act, together with its own emergency regulations adopted by California Water Commission on May 18, 2016, provide the proper means to address the depletion of groundwater storage.

Extension of the proposed Emergency Regulation could adversely affect our credibility with customers and the public, which is critical to ensure their response to calls for extraordinary conservation in the future. The District believes it is important to acknowledge the significant and visible changes in the water supply situation, while avoiding claims that the "drought is over." We believe this can best be accomplished by allowing the Emergency Regulation to expire without further extension and transitioning focus to long-term water-use efficiency through Implementation of the Governor's Executive Order B-37-16, Making Water Conservation a California Way of Life.

Sincerely,



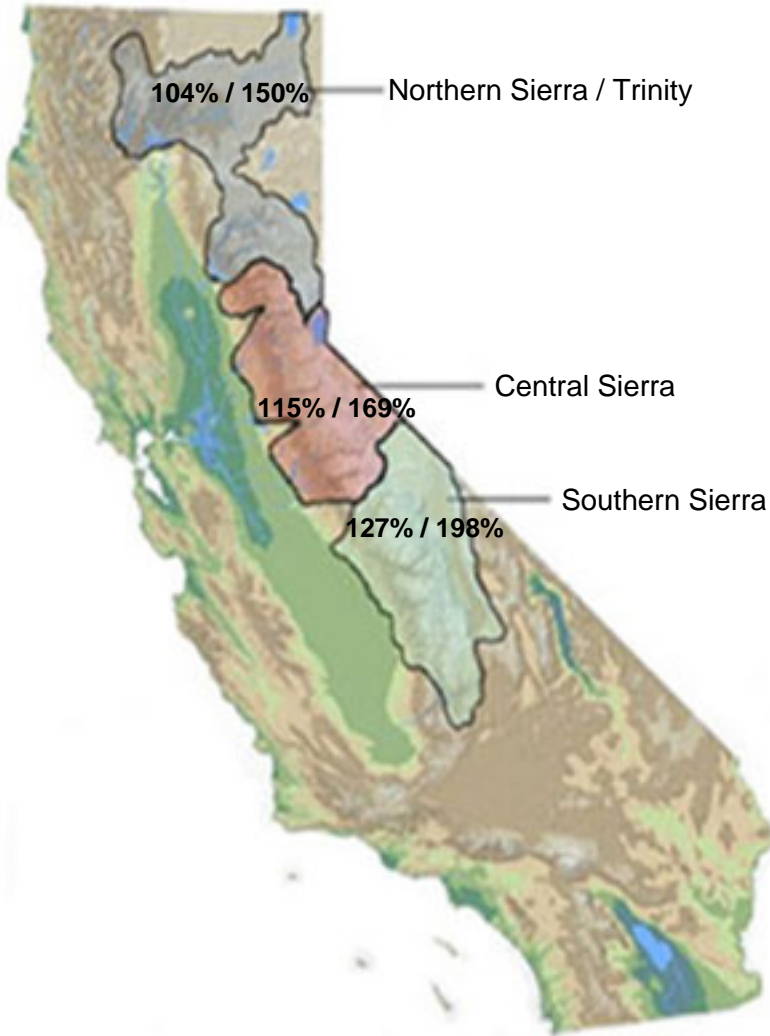
David W. Pedersen, P.E.
General Manager



Statewide Summary of Snow Water Content

Current Regional Snowpack from Automated Snow Sensors

% of April 1 Average / % of Normal for This Date



NORTH	
Data as of February 6, 2017	
Number of Stations Reporting	23
Average snow water equivalent (Inches)	29.1
Percent of April 1 Average (%)	104
Percent of normal for this date (%)	150

CENTRAL	
Data as of February 6, 2017	
Number of Stations Reporting	26
Average snow water equivalent (Inches)	38.2
Percent of April 1 Average (%)	115
Percent of normal for this date (%)	169

SOUTH	
Data as of February 6, 2017	
Number of Stations Reporting	29
Average snow water equivalent (Inches)	34.4
Percent of April 1 Average (%)	127
Percent of normal for this date (%)	198

STATE	
Data as of February 6, 2017	
Number of Stations Reporting	78
Average snow water equivalent (Inches)	34.1
Percent of April 1 Average (%)	116
Percent of normal for this date (%)	173

Statewide Average: 116% / 173%

Data as of February 6, 2017

California Data Exchange Center - Precipitation

SOUTHERN SIERRA PRECIPITATION 5-STATION INDEX

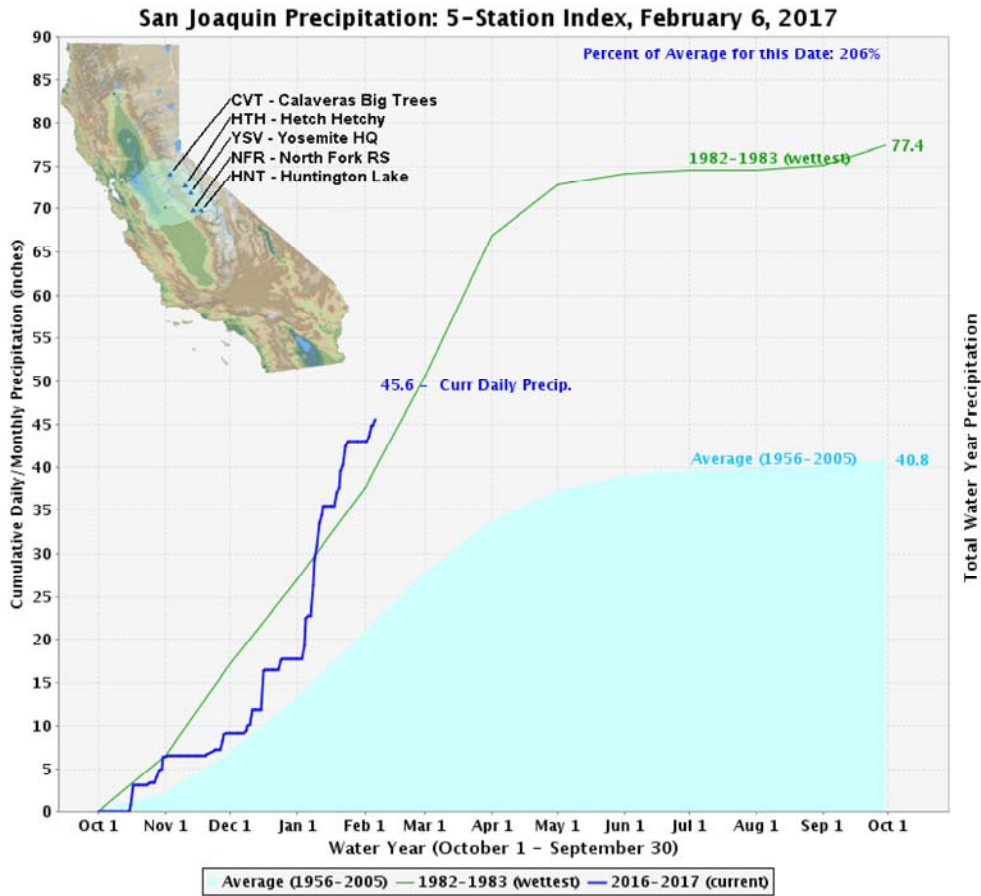
Choose water years to plot 5 station precipitation index:

- | | | | |
|---|------------------------------------|------------------------------------|---|
| <input type="checkbox"/> 1923-1924 (driest) | <input type="checkbox"/> 2006-2007 | <input type="checkbox"/> 2010-2011 | <input type="checkbox"/> 2014-2015 |
| <input type="checkbox"/> 1976-1977 (2nd driest) | <input type="checkbox"/> 2007-2008 | <input type="checkbox"/> 2011-2012 | <input type="checkbox"/> 2015-2016 |
| <input checked="" type="checkbox"/> 1982-1983 (wettest) | <input type="checkbox"/> 2008-2009 | <input type="checkbox"/> 2012-2013 | <input checked="" type="checkbox"/> 2016-2017 (current) |
| <input type="checkbox"/> 2005-2006 | <input type="checkbox"/> 2009-2010 | <input type="checkbox"/> 2013-2014 | |

Draw chart

(chart legend appears at bottom)

[Printable Version of Current Data](#)



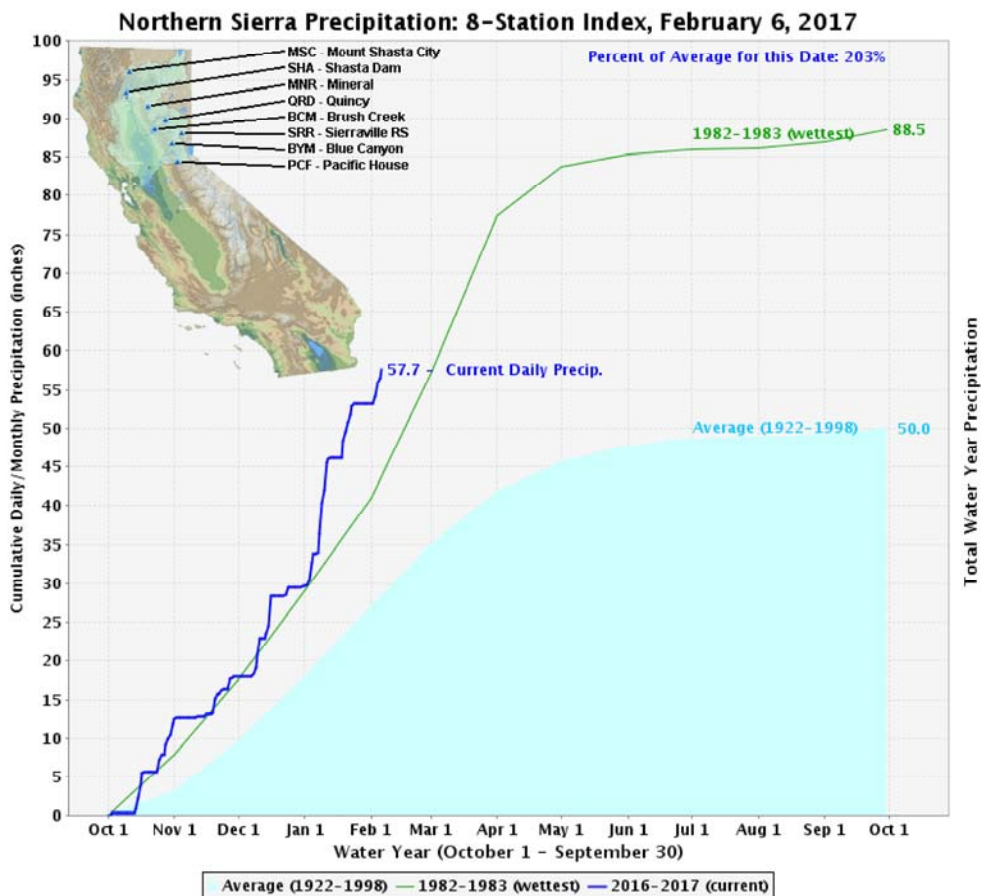
California Data Exchange Center - Precipitation

NORTHERN SIERRA PRECIPITATION 8-STATION INDEX

Choose water years to plot 8 station precipitation index:

- | | | | |
|---|------------------------------------|------------------------------------|---|
| <input type="checkbox"/> 1923-1924 (driest) | <input type="checkbox"/> 2002-2003 | <input type="checkbox"/> 2007-2008 | <input type="checkbox"/> 2012-2013 |
| <input type="checkbox"/> 1976-1977 (2nd driest) | <input type="checkbox"/> 2003-2004 | <input type="checkbox"/> 2008-2009 | <input type="checkbox"/> 2013-2014 |
| <input checked="" type="checkbox"/> 1982-1983 (wettest) | <input type="checkbox"/> 2004-2005 | <input type="checkbox"/> 2009-2010 | <input type="checkbox"/> 2014-2015 |
| <input type="checkbox"/> 2000-2001 | <input type="checkbox"/> 2005-2006 | <input type="checkbox"/> 2010-2011 | <input type="checkbox"/> 2015-2016 |
| <input type="checkbox"/> 2001-2002 | <input type="checkbox"/> 2006-2007 | <input type="checkbox"/> 2011-2012 | <input checked="" type="checkbox"/> 2016-2017 (current) |

(chart legend appears at bottom)
[Printable Version of Current Data](#)

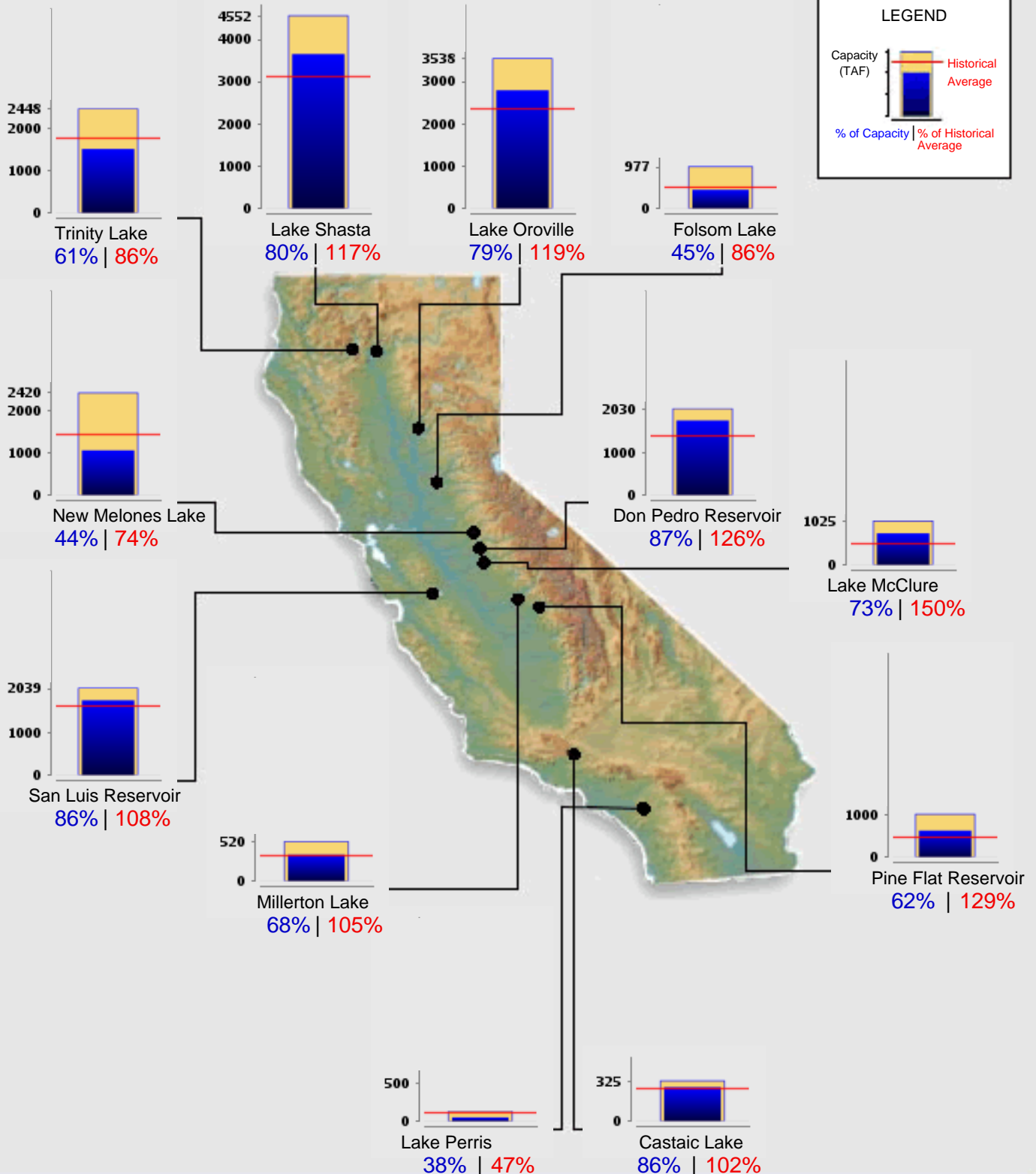




Reservoir Conditions

Ending At Midnight - February 5, 2017

CURRENT RESERVOIR CONDITIONS



Daily Reservoir Storage Summary

ENDING AT MIDNIGHT - 02/05/2017

FOR SELECTED RESERVOIRS IN NORTHERN AND SOUTHERN CALIFORNIA

Report generated: 02/06/2017 10:04

Reservoir Name	StalD	Water Storage									
		Capacity (AF)	Elevation (FT)	Storage (AF)	Storage Change	% of Capacity	Average Storage	% of Average	Outflow (CFS)	Inflow (CFS)	Storage - Year Ago This Date
TRINITY RIVER											
TRINITY LAKE	CLE	2,447,650	2,303.60	1,505,179	12,861	61	1,745,538	86	229	6,727	716,673
WHISKEYTOWN	WHI	241,100	1,198.48	205,623	619	85	205,759	100	1,921	2,233	205,829
LEWISTON	LEW	14,660	1,901.55	14,322	-60	98	13,831	104	362	333	14,061
RUSSIAN RIVER											
SONOMA(WARM SPRINGS)	WRS	381,000	456.34	259,241	-686	68	222,713	116	2,117	1,773	233,770
MENDOCINO (COYOTE)	COY	122,400	740.96	74,233	-34	61	68,984	108	495	480	73,197
SACRAMENTO RIVER											
SHASTA	SHA	4,552,000	1,034.77	3,655,497	46,902	80	3,117,307	117	21,653	45,299	2,457,229
KESWICK	KES	23,772	583.56	21,623	-538	91	21,649	100	22,619	22,348	18,554
FEATHER RIVER											
OROVILLE	ORO	3,537,577	849.35	2,799,641	2,006	79	2,343,925	119	29,910	30,855	1,620,142
ANTELOPE	ANT	22,566	5,003.60	24,078	115	107	17,136	141	---	---	20,606
FRENCHMAN	FRD	55,477	5,566.58	27,730	173	50	35,198	79	---	---	14,009
LAKE DAVIS	DAV	83,000	---	---	---	---	59,176	---	---	---	40,378
YUBA RIVER											
BULLARDS BAR	BUL	966,000	1,915.74	785,299	-3,466	81	591,349	133	---	---	613,933
ENGLEBRIGHT	ENG	70,000	531.22	73,470	-1,195	105	64,920	113	---	17,699	70,322
AMERICAN RIVER											
FOLSOM	FOL	977,000	408.69	440,141	3,734	45	514,147	86	16,426	18,309	584,489
UNION VALLEY	UNV	266,369	4,857.39	231,312	449	87	142,005	163	---	---	169,220
LOON LAKE	LON	69,306	6,401.88	58,360	-3,222	84	33,076	176	---	---	43,304
ICE HOUSE	ICH	43,496	5,432.32	32,368	35	74	21,814	148	---	46	30,233
NIMBUS	NAT	9,000	122.85	7,724	509	86	8,072	96	15,157	15,414	7,521
CACHE CREEK											
INDIAN VALLEY	INV	300,000	1,445.94	163,020	---	54	176,932	92	10	1,283	48,601
STONY CREEK											
BLACK BUTTE	BLB	143,700	444.21	40,038	1,515	28	48,090	83	3,034	3,802	45,012
CALAVERAS RIVER											
NEW HOGAN	NHG	317,000	673.82	174,525	698	55	139,308	125	503	861	76,335
MOKELUMNE RIVER											
CAMANCHE	CMN	417,120	210.59	250,648	-2,076	60	248,710	101	4,009	2,611	91,250
PARDEE	PAR	203,795	568.16	204,951	-539	101	178,660	115	2,617	---	165,948
STANISLAUS RIVER											
DONNELL'S	DON	64,320	---	40,458	-611	63	16,078	252	750	---	17,562
BEARDSLEY	BRD	97,800	---	78,522	-20	80	40,048	196	1,154	---	32,185
TULLOCH	TUL	67,000	502.42	57,960	123	87	55,978	104	210	273	55,780
NEW MELONES	NML	2,400,000	949.76	1,053,748	8,693	44	1,430,825	74	143	4,536	406,348
TUOLUMNE RIVER											
DON PEDRO	DNP	2,030,000	807.88	1,758,624	-6,621	87	1,400,162	126	---	---	840,318
HETCH HETCHY	HTH	360,000	---	---	---	---	169,716	---	---	---	279,271
CHERRY VALLEY	CHV	273,500	---	---	---	---	103,184	---	---	---	100,303
MERCED RIVER											
MC CLURE (EXCHEQUER)	EXC	1,024,600	822.85	745,384	-1,167	73	497,236	150	---	---	149,411
CHOWCHILLA RIVER											
EASTMAN (BUCHANAN)	BUC	150,000	564.98	114,029	585	76	62,867	181	508	805	23,974
FRESNO RIVER											
HENSLEY (HIDDEN)	HID	90,000	492.60	30,888	183	34	27,451	113	609	703	18,277

SAN JOAQUIN RIVER											
MILLERTON (FRIANT)	MIL	520,500	539.99	352,917	4,116	68	334,831	105	4,627	6,716	216,501
SAN LUIS CREEK											
SAN LUIS	SNL	2,041,000	521.70	1,763,543	13,058	86	1,630,587	108	---	---	719,532
KINGS RIVER											
PINE FLAT	PNF	1,000,000	879.03	622,059	592	62	480,703	129	3,064	3,369	215,903
KAWEAH RIVER											
KAWEAH (TERMINUS)	TRM	185,600	621.81	37,253	-1,447	20	21,505	173	1,942	1,214	30,887
TULE RIVER											
SUCCESS	SCC	82,300	625.32	35,042	-,212	43	18,623	188	1,088	984	12,033
KERN RIVER											
ISABELLA	ISB	568,000	2,568.97	226,020	2,484	40	175,057	129	663	1,932	38,111
TRUCKEE RIVER											
STAMPEDE	STP	226,500	5,922.54	146,600	400	65	135,693	108	---	---	31,000
INDEPENDENCE LAKE	INP	17,295	6,942.07	12,597	40	73	13,639	92	---	---	14,937
DONNER LAKE	DNN	9,700	5,930.23	4,887	-40	50	3,473	141	---	---	4,879
SANTA YNEZ RIVER											
CACHUMA LAKE	CCH	205,000	661.94	25,919	291	13	158,618	16	1	127	28,714
SOUTH COAST											
PYRAMID	PYM	180,000	2,575.70	166,949	2,262	93	162,529	103	---	---	168,459
CASTAIC	CAS	325,000	1,493.63	277,989	2,792	86	271,697	102	---	---	108,741
LAKE PERRIS	PRR	131,452	1,548.84	50,017	63	38	107,356	47	---	---	47,157

Total Storage (AF) 18,650,428 **Total Average Storage** 17,004,079 **Total % Group Average** 109.68%

AF - Acre Feet CFS - Cubic Feet per Second

Note: Reservoir Flows are daily averages.

Report name: | [Back](#)