



CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION

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2-7-17 Board Meeting-Item 9
Urban Water Conservation to Implement EO B-29-15
Deadline: 2/6/17 12 noon

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February 6, 2017

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



Subject: 2/7-2/8 Board Meeting/Hearing/Workshop – Item #9 Consideration of a proposed Resolution amending and readopting drought-related emergency regulations for urban water conservation to implement Executive Order B-29- 15, B-36-15 and B-37-16

Dear Chair Marcus and Members of the Board:

The California Municipal Utilities Association (CMUA) appreciates this opportunity to comment on the proposed resolution amending and readopting drought-related emergency regulations for urban water conservation (Emergency Regulation). CMUA's 40 public water agency members serve water to 70 percent of Californians.

CMUA's members demonstrated strong leadership in quickly mobilizing customers to meet California's emergency mandate. As the state faced severe drought conditions, our member agencies effectively communicated the drought emergency and customers stepped up to the plate, saving more water than ever before to help the state achieve its goals.

As the emergency regulation was extended, we appreciated the Board's transition to a "stress test" approach in which water suppliers were required to provide information on their supplies and demands over multiple years. We believe this both allowed for a focus on resiliency while ensuring agencies that had deficits continued to conserve. However, this current version of the Emergency Regulation is scheduled to expire on February 28, 2017 if the Board does not extend it and CMUA believes that the State Water Board should in fact let it expire. As noted during oral testimony at the January 18 workshop on the proposed extension, it is time to move away from a drought-centered approach to a more sustainable one. Even continuing with the stress test approach is not appropriate because it maintains the "emergency" nature of the regulation and the information provided by agencies through these assessments are part of long-term agency practices. Focus should shift to implementing Executive Order

Honorable Felicia Marcus, Chair

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B-37-16 and these sustained water efficient actions that will become a way of life for Californians throughout the state, including on-going data reporting and the process to permanently prohibit certain water uses.

Our agencies must preserve the ability to ask for extraordinary actions and sacrifice when they are warranted; finding the appropriate balance between emergency response and significant lifestyle changes that will endure. CMUA believes the best path forward is to let the existing Emergency Regulation expire. Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Blacet', written in a cursive style.

Danielle Blacet

Director for Water

Cc: The Honorable Frances Spivy-Weber, Vice Chair, State Water Board
The Honorable Dorene D'Adamo, Member, State Water Board
The Honorable Steven Moore, Member, State Water Board
The Honorable Tam Doduc, Member, State Water Board
Ms. Kim Craig, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown Jr.
Mr. Tom Howard, Executive Director, State Water Board
Mr. Eric Oppenheimer, Chief Deputy Director, State Water Board
Mr. Max Gomberg, Climate Change Mitigation Strategist, State Water Board