



February 6, 2017

Felicia Marcus, Chair
and Members of the
State Water Resources Control Board
Attention: Jeanine Townsend, Clerk of the Board
1001 "I" Street, 24th Floor
Sacramento, CA 95814

Via email to commentletters@waterboards.ca.gov

**Subject: 2/7–2/8/17 Board Meeting – Item #9 Proposed Resolution Regarding Amending
and Readopting Drought Emergency Regulations**

Dear Chair Marcus and Members of the State Water Resources Control Board:

We wish to thank you for your leadership as our state responded to California's unprecedented drought over the past six years. We appreciate the opportunity to provide comments regarding the proposed amendment and re-adoption of the Emergency Regulations for Statewide Urban Water Conservation.

The May 2016 Emergency Regulation reflected improved conditions in the state's drought, and also appropriately considered water suppliers' ability to meet projected demands for an additional three years. It considered local conditions including projected demands, available supplies, storage, and the use of alternative, sustainable sources of supply, such as potable reuse, recycled water, and water supplies specifically designated for emergency use only. Using this approach, 344 water agencies across the state had demonstrated the sufficiency of their supplies to meet projected demands for three additional years of drought before the significant rainfall and snow experienced throughout the state in January 2017.

The Sierra Nevada snowpack, which supplies water to one-third of the state, is at 173% of normal to date, and 116% of the April 1 average. The 8-Station precipitation index is at 203% to date, and 113% of an average year. The improved hydrologic conditions mean that the possibility of water suppliers throughout the state experiencing a water shortage during the next 270 days is very remote. Many of the state's reservoirs have already shifted to flood control operation. Additional conservation of surface water may contribute to increased potential for flooding in many communities.

Extending the statewide drought emergency given the significantly improved conditions and risk of flooding would undermine the State's credibility and the credibility of retail water agencies who are responsible for communication with their customers. It would create a significant

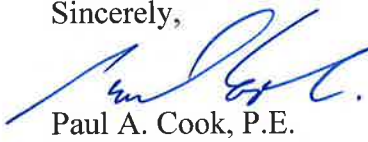
Felicia Marcus, Chair
and Members of the
State Water Resources Control Board
February 6, 2017
Page 2

customer communications challenge for water agencies who are rescinding their own drought declarations to reflect actual conditions. Extraordinary conservation measures and messaging are tools that should be preserved for use when actual shortages are projected and supplies are not adequate to meet customer demands. Although the resolution implies that no additional rainfall or snow this winter could threaten water supplies this summer, that is not the case. Improved groundwater recharge and sustainable management will take several years in some areas, and this will not be materially changed by extending the drought regulation. While there are small pockets of the state that may still experience potential shortages, those should be addressed on a local basis, and not by extending statewide regulations. Since no shortages are projected, IRWD's Board will be considering a resolution to rescind its drought declaration on February 13, 2017. IRWD believes that the Emergency Regulations should be allowed to expire on February 28, 2017, and the state transition into a focus on long-term water efficiency as a California way of life.

IRWD supports the Governor's California Water Action Plan and its calls for increased integrated planning that combines enhanced water efficiency with incentives for local investments into California's future water reliability. Future water reliability will depend on water efficiency, storage, emergency drought supplies and other sustainable supplies such as recycled water, potable reuse and desalination.

Although improved conditions no longer warrant continued Emergency Conservation Regulations, IRWD is committed to long-term water use efficiency and we look forward to continuing to work with the State Board to implement the proposed long-term framework. We thank you for your consideration of our comments. Please do not hesitate to contact me or Fiona Sanchez at (949) 453-5325 if we can be of assistance to you or your staff.

Sincerely,



Paul A. Cook, P.E.
General Manager