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2-7-17 Board Meeting-Item 9
Urban Water Conservation to Implement EO B-29-16
Deadline: 2/6/17 12 noon

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



February 6, 2017

RE: Comments on Urban Water Conservation Emergency Regulation

Dear Chair Marcus:

Desert Water Agency (DWA) thanks the State Water Resources Control Board (State Water Board) for another opportunity to comment on the extension of emergency regulations on urban water conservation. We appreciate the involvement and considerations over the past 21 months and look forward to working with the State Water Board on long-term regulations.

DWA saw merit in the state's stress test model during 2016 when there was still uncertainty looming about whether drought conditions would persist. Now, we would ask that the Board allow the emergency regulation to expire. Recent storms have put the statewide snowpack (as of February 2) at about 110% of average April 1 levels. Additionally, most of the state's largest reservoirs are above average levels. This means even if we do not see storms contribute to reservoir levels or snowpack for the rest of the water year, California is still in a good place.

While there is room to be made in efficiency and even long-term conservation, the emergency status is no longer warranted. We want to ensure that our local stakeholders respond to future emergencies and take State Water Board actions seriously. Continuing the emergency regulations at this time would likely damage the credibility of the State Water Board and also local agencies. Local agencies are the enforcement arm of the emergency regulation. Media and our customers rely on us as a trusted source of information on the drought and water use restrictions.

DWA understands the desire of the State Water Board to maintain data collection. DWA would be willing to continue to report data on a monthly basis until the long-term regulations are in place. Many other agencies expressed their willingness to do so at the workshop on January 18. When a statewide emergency does not exist, local agencies should be the authority on local water use decisions. DWA set its own 10-13% goal, despite not being required to under the stress test framework.

Since the mandatory percentage reduction was eliminated and DWA set its target, our customers have continued to save 20% compared to 2013. Our cumulative savings since restrictions went into place are above the statewide average at 24%, despite the fact that we have an adequate water supply in storage. Many of the changes made will have lasting contributions to water savings. Now is the time to focus on long-term changes.



Californians are embracing water conservation as a way of life and the state's water agencies will be held to new, more strict long-term standards in the near future.

We appreciate the level of engagement that the urban water agencies have had in this process and look forward to continued collaboration on long-term efforts as the details of the long-term conservation framework are fleshed out in the coming years. We also hope that the State Water Board looks to other sectors in determining what emergency regulations may be appropriate in the future given that urban water use accounts for a relatively small percentage of total water use in California.

Thank you for reviewing our comments, and for your work to make water use more efficient in our great state.

Sincerely,

A handwritten signature in black ink that reads "Mark S. Krause". The signature is written in a cursive, flowing style.

Mark S. Krause
General Manager-Chief Engineer

Cc:

The Honorable Frances Spivy-Weber, Vice Chair, State Water Resources Control Board
The Honorable Dorene D'Adamo, Member, State Water Resources Control Board
The Honorable Steven Moore, Member, State Water Resources Control Board
The Honorable Tam Doduc, Member, State Water Resources Control Board
Ms. Kim Craig, Deputy Cabinet Secretary, Office of Governor Edmund G. Brown Jr.
Mr. Tom Howard, Executive Director, State Water Resources Control Board
Mr. Eric Oppenheimer, Chief Deputy Director, State Water Resources Control Board
Mr. Gary B. Bardini, Deputy Director, Integrated Water Management, Department of Water Resources
Mr. Kamyar Guivetchi, Manager, Statewide Integrated Water Management, Department of Water Resources