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MEMBER AGENCY OF THE  
METROPOLITAN WATER  
DISTRICT  
OF SOUTHERN CALIFORNIA



July 14, 2014

Ms. Jeanine Townsend, Clerk of the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

**RE: Comment Letter – July 15, 2014 Board Meeting – Item 10:  
Emergency Water Conservation Regulations**

Dear Ms. Townsend:

Las Virgenes Municipal Water District supports the proposed emergency water conservation regulations to be considered by the State Water Resources Control Board (SWRCB) at its July 15, 2014 Board meeting. The action is warranted considering the unprecedented dry conditions throughout the state; drought emergency proclamation by Governor Edmund G. Brown, Jr.; and uncertainty of water supply conditions for the coming year.

Considering the urgency of the proposed action, we appreciate the efforts of SWRCB staff and Board Members to coordinate with representatives of the Association of California Water Agencies (ACWA), California Municipal Utilities Association (CMUA), and California Urban Water Agencies (CUWA) on preparation of the proposed regulations. The regulations provide flexibility to urban water suppliers to implement their own specific mandatory conservation measures, recognizing that local agencies are best-suited for this task, while ensuring that meaningful action is taken statewide.

The following specific comments are provided for consideration.

- Select an alternate or additional “baseline” for the purpose of making comparisons with monthly urban water usage data that will be submitted to the SWRCB. Urban water suppliers throughout the state have achieved varying levels of conservation success in recent years with many experiencing demand hardening indoors and, more recently,

Ms. Jeanine Townsend  
July 14, 2014  
Page 2

some encountering the same outdoors. For these agencies, comparisons with prior-year usage data would not adequately recognize their proactive approach to conservation and the effect of demand hardening in limiting near-term reductions in water usage. One logical approach would be to utilize baseline per capita water usage data already established for the purpose of compliance with the Water Conservation Act of 2009 (20x2020).

- Continue to solicit feedback from ACWA, CMUA, CUWA and urban water suppliers on any additional water conservation regulations that may be considered in response to the statewide drought.

Again, we support the SWRCB in its emergency response to the drought conditions and appreciate the consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "David W. Pedersen". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

David W. Pedersen, P.E.  
General Manager