



Roy Leidy
Director Division 1

Mark R. Emmerson
Director Division 2

John A. Wallace
Director Division 3

7837 FAIR OAKS BOULEVARD
CARMICHAEL, CALIFORNIA 95608
TELEPHONE: 483-2452
FAX: 483-5509

Ron Greenwood
Director Division 4

Paul Selsky
Director Division 5

Steve M. Nugent
General Manager

Delivered by e-mail to: commentletters@waterboards.ca.gov

January 27, 2016

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



Subject: Public comment for February 2, 2016, Conservation Extended Emergency Regulation

Dear Chair Marcus and Members of the Board:

The Carmichael Water District (CWD) has reviewed the Notice of Proposed Regulatory Framework for the Prohibition of Activities and Mandatory Actions during Drought Emergency. We appreciate the opportunity to comment, and hope that our comments will assist the State Water Resources Control Board (SWRCB).

CWD appreciates the SWRCB's efforts to provide some equitability within the existing Emergency Regulation; however, CWD finds great concern over the lack of any transition or exit strategy from the Emergency Regulation should hydrologic conditions warrant such a revision in April of 2016. CWD customers are keenly aware of the drought and have responded. Since declaring a water shortage emergency in January of 2014, CWD has achieved some of the highest summer conservation levels in the state in 2014 and 2015. This level of conservation, well above the statewide goal of 25%, has come at a price to our customers in the form of economic losses due to dying landscapes and trees along with lost revenues and increased spending to enact the SWRCB's emergency regulations. The proposed framework completely ignores the need for adjustment to the regulation should drought conditions improve this spring. Subjecting CWD customers to emergency conservation measures, and the losses that accompany those standards, when conditions do not warrant would undermine the public trust and cooperation during future emergency conditions.

CWD is ready and willing to assist the SWRCB in seeking a workable approach to water conservation during the current drought; however, CWD believes that any extension of the current Emergency Regulations without a clear strategy to address improved drought conditions would be irresponsible and risks the loss of public trust.

Sincerely,

A handwritten signature in black ink that reads "Steve Nugent".

Steve Nugent
General Manager