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February 2, 2017

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

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: February 8, 2017 BOARD MEETING (Conservation Extended Regulation)

Dear Chair Marcus and Members of the Board:

The Carmichael Water District (CWD) has reviewed the draft Proposed Regulation that extends the current Urban Water Conservation Regulation that is set to expire on February 28, 2017. CWD appreciates the opportunity to comment, and hopes that our comments will assist the State Water Resources Control Board (State Water Board).

As previously stated in our letter dated January 11, 2017, CWD believes that current water supply conditions no longer support the need for a statewide drought emergency regulation. Water supply conditions have improved considerably since the State Water Board's Emergency Regulation was first adopted in May 2015 as evidenced in the State experiencing increased precipitation levels above historical averages, flood control on reservoirs, and a snowpack above historical averages. CWD again recommends that the State Water Board allow the current Emergency Regulation to expire in February 2017 and not adopt the Proposed Resolution that extends the current Urban Water Conservation Regulation.

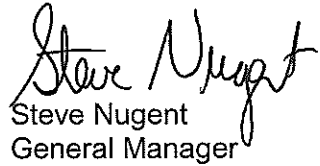
On page two of the Draft Report under item number nine (9) it states "When conservation becomes a social norm in a community, the need for enforcement is reduced or eliminated". CWD agrees with this statement. In fact our customers are clearly aware of the need for continued water efficiency and have demonstrated this through a cumulative water saving of 31% since June of 2015. This level of conservation, well above the statewide goal of 25%, demonstrates a conservation mindset that should not be met with further State driven "enforcement" of emergency regulations when current supply conditions and customer driven savings do not warrant such "enforcement".

The Draft Report directs State Water Board staff to use the Electronic Annual Report to collect monthly production volumes and any actions taken by the supplier to encourage or require conservation for distributors of a public water supply. This seems to only apply to small water systems since the text of the proposed extended Emergency Regulation still maintains the requirement of water suppliers to provide monthly monitoring reports. It appears that the State Water Board staff recognizes that the Electronic Annual Report satisfies the flow of monthly production volume and conservation activity data. This is a standard then that needs to apply to all water systems regardless of size. Continuing to require monthly reporting, while the majority

of water agencies in the State have demonstrated adequate three year supplies, would only serve to further fuel misrepresentations that water suppliers are "backsliding" from prior mandatory conservation targets.

CWD remains ready to assist the State Water Board in seeking a workable approach to water conservation during future drought; however, CWD believes that now is the time for the focus to shift from emergency conservation to long term water efficiency. Allowing the current Emergency Regulation to expire would demonstrate to Californians that the State Water Board recognizes their efforts to make conservation a way of life while still maintaining a continuous flow of data through the Electronic Annual Reports.

Sincerely,



Steve Nugent
General Manager