January 11, 2017

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

Re: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus and Members of the Board:

Thank you for the opportunity to provide input on the potential extension and modification of the current Emergency Regulation for Statewide Urban Water Conservation. Las Virgenes Municipal Water District (District) supports the Governor’s Executive Order B-37-16 and development of a long-term framework for water-use efficiency and drought resilience.

With respect to the Emergency Regulation, the District recommends that the State Water Resources Control Board allow it to expire on February 28, 2017, without further extension. The recent, dramatic improvements in hydrologic conditions statewide no longer support the need for the Emergency Regulation and extension of it, even a modified version, could adversely affect our credibility with customers and the public.

The elements of the regulation allowing urban water suppliers to self-certify information upon which supply reliability-based conservation standards can be imposed should be preserved for future use, if necessary. However, the District believes it is the appropriate time to shift focus to the long-term framework for “Making Water Conservation a California Way of Life,” which would substantially reduce the need for emergency regulations in the future.

Sincerely,

David W. Pedersen, P.E.
General Manager