



**CITRUS  
HEIGHTS  
WATER  
DISTRICT**

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January 12, 2017

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> floor  
Sacramento, CA 95814

via email to: [commentletter@waterboards.ca.gov](mailto:commentletter@waterboards.ca.gov)

SUBJECT: Comment Letter – Urban Water Conservation Workshop

Dear Ms. Townsend:

Citrus Heights Water District (CHWD) appreciates the opportunity to comment on the Notice of Public Workshop regarding the Emergency Regulations for Statewide Urban Water Conservation dated January 6, 2017. CHWD is a Special District with 19,837 metered connections and provides drinking water to over 65,000 customers. The District provides both groundwater and surface water to our customers.

CHWD's water supply conditions have dramatically improved since the Emergency Regulations were first adopted in May 2015. We believe that current conditions no longer constitute a statewide drought emergency that calls for State intervention in local water management decisions. In many parts of the State, precipitation levels are now at or above average historical levels, reservoirs are spilling to ensure flood protection, and snowpack is at historical averages. Based on the current conditions, CHWD recommends the State Water Resources Control Board (State Water Board) allow the current Emergency Regulations to expire in February 2017.

In May 2016, the State Water Board adopted Emergency Regulations that focused on a demonstration by water suppliers of whether they had adequate supplies to respond to three additional dry years. CHWD believes this represents a sound water management approach given improved conditions, and should be considered by the State Water Boards moving forward. In light of current hydrologic conditions, there is no justification to consider a return to mandatory conservation targets on a statewide basis. Instead, the most productive action now would be to shift our focus to developing a credible longer term sustainable approach to planning for drought and improving water use efficiency over time.

Since the Emergency Regulations were first adopted in May 2015, CHWD customers have repeatedly responded to local water supply conditions and demonstrated they are willing to do their part while conserving. As compared to the District's 2013 water consumption, CHWD customers saved 17% in 2014, 33% in 2015 and 27% in 2016. The District has built up "good faith" when asking customers to respond to our calls to action during times of a drought. Imposing mandatory limits based on statewide conditions, will strain our customer/District trust concerning this matter. Based on the District's 3-Dry Year stress test, CHWD demonstrated we are well situated to respond quickly if our region should return to severe drought conditions in the future. CHWD strongly recommends the State Water Board allow a 90 day comment period on policy recommendations. The complexity and long-term ramifications of policy recommendations should be given ample time to properly analyze, evaluate and respond to. CHWD is required to give a 45 day response time for our Prop 218 notices and the State Water Board should be held to a similar standard.

CHWD is dedicated to preparing for future droughts and advancing water supply reliability through a balanced approach that includes the continued development of resilient supplies as well as demand management. We look forward to working together to implement the comprehensive California Water Action Plan. Let's move on from crisis management and focus on building a sustainable and resilient future.

Respectfully,

A handwritten signature in blue ink, appearing to read "Hilary M. Strauss", with a long horizontal flourish extending to the right.

Hilary M. Strauss  
General Manager