January 12, 2017

VIA EMAIL: commentletters@waterboards.ca.gov

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

Re: Comments on Potential Extension of Emergency Regulation for Statewide Urban Water Conservation

Dear Ms. Townsend:

We represent the Public Water Agencies Group ("Group"), an informal association of 16 public agency water suppliers\(^1\) who provide wholesale and retail water service in Los Angeles County. The Group is pleased to offer its comments in connection with the Public Workshop to be held on January 18, 2017, at which the State Water Resources Control Board will receive input on the extension and potential modification of the current Emergency Regulation for Statewide Urban Water Conservation.

The Group’s comments will be short and to the point. In light of the rainfall and snowfall that has occurred throughout California over the past two months, and particularly over the past two weeks, the Group believes it is most appropriate for the State Water Board to simply extend the existing Emergency Regulation for an additional 90 days. That extension will allow the State Board to take into account the hydrological conditions of the state through the primary rain and snow season before taking any action to substantively modify the Emergency Regulation.

In that regard, water agencies incur costs in having to compile and report information, alter their operations and inform their customers when water conservation regulations are

\(^1\) The Group consists of Crescenta Valley Water District, Kinneloa Irrigation District, La Habra Heights County Water District, La Puente Valley County Water District, Newhall County Water District, Palmdale Water District, Pico Water District, Quartz Hill Water District, Rowland Water District, San Gabriel County Water District, San Gabriel Valley Municipal Water District, Sativa-Los Angeles County Water District, South Montebello Irrigation District, Three Valleys Municipal Water District, Valley County Water District and Walnut Valley Water District.
modified. Extending the Emergency Regulation for the full additional 270 days with substantive modifications will result in water agencies again incurring costs when hydrological conditions may not warrant such modifications.

Moreover, the statistics have borne out that Californians are continuing to conserve water. Thus, the status quo is at an acceptable level of conservation and further modifications at this time do not appear to be necessary. The Group therefore strongly urges the State Water Board to continue with the status quo for an additional limited time and then re-evaluate any modifications or possible further extensions after the primary wet months have passed.

Thank you for this opportunity to comment.

Very truly yours,

James D. Ciampa

JDC/cc

cc: Public Water Agencies Group (via e-mail)