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January 11, 2017

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



Subject: Comment Letter – Urban Water Conservation Workshop

Dear Ms. Townsend:

The Carmichael Water District (CWD) has reviewed the Notice of Public Workshop regarding the Emergency Regulation for Statewide Urban Water Conservation dated January 6, 2017. CWD appreciates the opportunity to comment, and hopes that our comments will assist the State Water Resources Control Board (State Water Board).

Water supply conditions have improved considerably since the State Water Board's Emergency Regulation was first adopted in May 2015. Although there are some areas in the State that may experience some water shortage conditions in 2017 much of the State is experiencing increased precipitation levels above historical averages, flood control on reservoirs, and a snowpack approaching historical averages. CWD believes that current conditions no longer support the need for a statewide drought emergency regulation. CWD recommends that the State Water Board allow the current Emergency Regulation to expire in February 2017.

CWD and our customers are clearly aware of the need to conserve during drought conditions 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%, came 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 State Water Board's Emergency Regulations. Subjecting CWD customers to emergency conservation regulations when current conditions do not warrant it would undercut the public trust and support during future water shortages.

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 focus to shift from emergency conservation to long term water efficiency. CWD will continue with local investments in drought-resiliency and ongoing water-use efficiency, but any extension of the current Emergency Regulations in light of improved conditions would risks the loss of public trust.

Sincerely,

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

Steve Nugent
General Manager