



December 2, 2015

The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Ms. 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 Chair Marcus and State Water Resources Control Board Members:

The Santa Clara Valley Water District (District) appreciates the opportunity to provide input and recommendations for the State Water Resources Control Board's (State Water Board) consideration of the potential extension and modification of the Emergency Regulation for Statewide Urban Water Conservation (Emergency Regulations).

As the primary water resources and groundwater management agency for the nearly 2 million residents and wholesaler to 13 urban water suppliers of Santa Clara County, the District strongly supported the efforts of the State Water Board in establishing the Emergency Regulations as it has complemented and supported our local efforts. On November 24, 2015 the District Board of Directors extended our call for a 30 percent reduction through June 30, 2016. We appreciate and commend the State Water Board's effort as well as your ongoing solicitation of input on the emergency water conservation framework. We offer the following comments for your consideration in evaluating the potential extension and modification of the Emergency Regulations.

1. Continue With the Current Restrictions and Re-Evaluate Requirements in April 2016

The District recommends the State Water Board extend the requirements for implementation of specific water use measures and the prohibition of specific water uses until at least April 2016. Further, we support extending monthly water production/use reporting, since it enables transparent communication and conservation progress feedback and is a primary driver for achieving demand reductions. The District also recommends that the State Water Board re-evaluate the need for a potential extension/renewal of mandatory water use reductions in Spring 2016, based on water supply conditions at that time.

2. Water Shortage Contingency Planning for the Long Term

We recommend the State Water Board develop a statewide drought contingency plan with predetermined triggers and state actions in response to future drought conditions. This will provide for more effective planning and better preparedness at both the State and local level. State actions would be more predictable and local agencies would be able to more efficiently align with State efforts.



3. Consideration of Local Conditions

The District recommends that the State Water Board consider regional/local water supply conditions when determining short-term mandatory water use reduction requirements. The proposed conservation standards should consider calls for urgent conservation made by local water management agencies, which in some cases may be higher than the State Water Board target. These requests are based on local needs – in our case, the need to protect our groundwater basins and minimize the risk of additional land subsidence. Our local water retailers have done an excellent job to voluntarily meet our target; however, others throughout the State may not be as responsive to their water management agency. In consideration of local needs, we recommend that the State Water Board defer to local water management agencies that have called for a higher level of savings than the State, and that the State Water Board, in concert with the local water management agency strategy, revise their conservation standards to be consistent with these local requests. This approach would help ensure consistent messaging within local communities, a key issue in engaging the community to achieve the needed savings.

4. Grant Funding to Address Affordability Issues

The State should consider using State grant funds to offset increases for low income residents. The current mandatory water use reductions have resulted in unintended consequences for some communities, including creating undue hardships for customers, exacerbating affordability issues, and potentially affecting the economy and the ability to repair and rehabilitate infrastructure. The State Water Board should evaluate the economic consequences of mandatory water use restrictions and develop a program to provide relief where it is most needed.

5. Promote Recycled Water Development

The State Water Board should continue its efforts to promote the expanded use of recycled water, both non-potable reuse and potable reuse. Although recycled water development is outside of the scope of the Emergency Regulations, continued State efforts are necessary to expedite projects that are in development during the existing drought and projects that will create resilience to future drought conditions. The drought is stretching resources at the State, regional, and local levels, but we must continue our efforts to invest in developing local and regional supplies that increase drought resilience and adapt to climate change.

The District is committed to continuing to work with the State, regional partners, and our local community to continue to implement effective drought response strategies, increase long-term water conservation savings, and develop new supplies that are drought resilient in a changing climate.

Sincerely,



Beau Goldie
Chief Executive Officer

cc: J. Fiedler, G. Hall, R. Callender

