



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

### **Members**

California American Water  
Carmichael Water District  
Citrus Heights Water District  
Del Paso Manor Water District  
El Dorado Irrigation District  
Elk Grove Water District  
Fair Oaks Water District  
Folsom, City of  
Golden State Water Company  
Lincoln, City of  
Orange Vale Water Company  
Placer County Water Agency  
Rancho Murieta Community Services District  
Roseville, City of  
Rio Linda / Elverta Community Water District  
Sacramento, City of  
Sacramento County Water Agency  
Sacramento Suburban Water District  
San Juan Water District  
West Sacramento, City of  
Yuba City, City of

### **Associates**

County of Placer  
El Dorado County Water Agency  
Sacramento Area Flood Control Agency  
Sacramento Municipal Utility District  
Sacramento Regional County Sanitation District

Dear Ms. Townsend:

The Regional Water Authority (RWA) appreciates the opportunity to comment on the Notice of Public Workshop regarding the Emergency Regulation for Statewide Urban Water Conservation dated January 6, 2017. RWA is a Joint Powers Authority that represents 21 water suppliers in the greater Sacramento region. Collectively, these agencies provide reliable water supplies to approximately two million residents and thousands of businesses.

Water supply conditions have drastically improved since the Emergency Regulation was first adopted in May 2015. 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 or above historical averages. We believe that current conditions no longer constitute a statewide drought emergency that calls for State intervention in local water management decisions. We recommend the State Water Resources Control Board (State Water Board) allow the current Emergency Regulation to expire in February 2017. We recognize that some limited areas of the State may still face potential water shortages in 2017, and urge the State Water Board to focus on those communities that require assistance in meeting their water needs.

In May 2016, the State Water Board adopted an Emergency Regulation that focused on a demonstration by water suppliers of whether they had adequate supplies to respond to three additional dry years. Unfortunately, this new standard was widely misinterpreted as “backsliding” from the prior mandatory conservation targets, when in fact it represented a sound water management approach given improved conditions. 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 approach to planning for drought and improving water use efficiency over time.

Our region’s customers have decreased total water demand 9% from 2000 to 2013, while population increased 17%, demonstrating a commitment to long-term water efficiency. Additionally, customers saved 19% in 2014 under voluntary conservation targets and 30% from June 2015 to June 2016 under State mandated conservation targets, demonstrating the region’s ability to aggressively conserve in times of real or potential shortage. We are well situated to respond quickly if our region or the State should return to severe drought conditions in the future.

Furthermore, the State's current water supply conditions, including flood control releases from major reservoirs, highlight the necessity of embracing all of the actions in the California Water Action Plan. For example, expanding water storage capacity and promoting safe and effective water transfers would allow California to take advantage of these recent storms. To truly prepare for the effects of climate change, the State needs to implement a portfolio of solutions, in which conservation is one action among many.

RWA 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 black ink, appearing to read 'John Woodling', with a stylized, circular flourish at the beginning.

John Woodling  
Executive Director