



July 11, 2014

Jeannine Townsend
Clerk to the Board
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812



Subject: SCVWD Comments on Draft Emergency Water Conservation Regulations

Dear Ms. Townsend:

The Santa Clara Valley Water District (District) appreciates the State Water Resources Control Board's (State Board) effort to further reduce water use throughout the state. The District is generally supportive of the draft emergency regulations; however we would like to take this opportunity to provide several comments for your consideration:

Baseline

We are pleased that the State Board is now using 2013 as the base year for estimating water use reductions. We recommend that when calculating the reductions January be excluded since it was exceptionally warm, dry and there was no call for reduction at the time.

Sec. X.1 Prohibited Activities

We request that the following restrictions be added to Sec.X.1.(a):

- Use of water for irrigation more often than three days per week through the month of October and one day a week for November through March. Exceptions given for landscape irrigation zones that exclusively use very low flow drip irrigation systems.
- Use of water for irrigation between the hours of 9 a.m. and 5 p.m. except by use of a hand-held bucket, a hand-held hose equipped with a positive self-closing water shut-off nozzle, or for very short periods of time for the express purpose of adjusting or repairing an irrigation system.

We also request that the language in Sec.X.1.(b) be expanded to give enforcement capabilities to special districts.

Sec.X.2 Mandatory Actions by Water Suppliers

The draft regulations do not distinguish between retail urban water agencies and wholesale water agencies. In many cases, wholesale water agencies do not include specific end-user restrictions in their drought response stages. We recommend Sec.X.2.(b) be clarified that it applies to retail urban water agencies and that wholesale agencies are encouraged to support their retailers' implementation of mandatory measures.



Sec.X.2.(d) requires each urban water supplier to provide monthly production data, including estimates of per capita water use. We caution the State Board as this could lead to double counting since retail urban agencies and wholesale agencies will be reporting overlapping data. Furthermore, in many cases wholesale water agencies only provide a portion of the water supply to a water retailer. For this reason wholesale agencies are not required to comply with SBx 7-7. We request that Sec.X.2.(d) be clarified that it only applies to retail urban water agencies.

Thank you for considering these recommendations. Please contact me at (408) 630-2634 if you have any questions.

Sincerely,



Beau Goldie
Chief Executive Officer