



January 28, 2016



The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comments on Proposed Extended Emergency Water Conservation Regulation

Dear Chair Marcus and Members of the Board:

The Bay Area Water Supply and Conservation Agency (BAWSCA) appreciates the opportunity to provide input as the State Water Resources Control Board (Board) considers the Draft Emergency Regulation for Urban Water Conservation. BAWSCA provides regional water reliability planning and conservation programming for the benefit of its 26 member agencies that deliver water to over 1.7 million residents and nearly 33,000 commercial, industrial and institutional accounts in Alameda, San Mateo and Santa Clara Counties.

We appreciate that the Board has added credits and adjustments to the Draft Emergency Regulation without redistributing the savings requirements to other water agencies.

Additionally, the Board has done a laudable job of implementing the directives within the Governor's Executive Orders under a challenging timeframe. As the process moves forward, BAWSCA suggests that the Board:

- Establish a process for rescinding the mandatory reductions enacted as part of the emergency regulation should water supply conditions warrant.
- Clarify that the revised emergency regulation will not be applicable in future droughts and should not be construed as the basis for future drought response by the State.

We look forward to working pro-actively in partnership with the Board, DWR and other stakeholders on a redirected process for long-term water use efficiency policy and drought response.

Thank you for your consideration of these comments. If you have any questions, please contact me at NSandkulla@BAWSCA.org or (650) 349-3000.

Sincerely,

A handwritten signature in blue ink that reads "Nicole Sandkulla".

Nicole Sandkulla
CEO/General Manager

cc: BAWSCA Board Members
BAWSCA Water Management Representatives
A. Schutte, Hanson Bridgett, LLP