



January 6, 2016

To: [Kathy.Frevert@waterboards.ca.gov](mailto:Kathy.Frevert@waterboards.ca.gov)

**Subject: Comments on Proposed Regulatory Framework**

Thomas Howard, Executive Director  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Dear Mr. Howard:

The Monterey Peninsula Water Management District (MPWMD) appreciates the opportunity to comment on staff's proposed revisions to the Emergency Regulation. The following comments are related to (1) the need to revisit an Extended Emergency Regulation at the conclusion of the rainy season; (2) consideration of an exemption for regions without drought conditions and no exports/imports; and (3) revisions for suppliers with significant seasonal or transient populations.

Revisit an Extended Emergency Regulation in April 2016

The uncertainty of continuing drought following the 2016 winter should be considered before the long-term extension of the Emergency Regulation. Continuing a mandatory conservation program if the State has sufficient supplies would make the conservation message difficult to deliver and harder to enforce.

Consider an Exemption for Regions Without Drought Conditions and No Exports/Imports

Our region is not dependent on Sierra snowpack, the Delta, or the Colorado River. We have a longstanding Water Conservation and Standby Rationing Plan that allows us to annually assess the physical supply of water relative to expected demand and make conservation and rationing decisions based on the data. Our physical supply has not been impacted by the drought. On the Monterey Peninsula, even with less than average precipitation, our local hydrologic units fill, we have more than a two year supply, and water runs out to sea. The State Water Board should evaluate local supply conditions in self-sufficient systems.

Revisions for Suppliers with Significant Seasonal or Transient Populations

The Monterey Peninsula experiences a number of transient populations, primarily during the summer months. A significant number of homes that sit vacant during the winter are often occupied by second home owners or renters during the spring and summer months. This "residential" water use is reported to SWRCB, resulting in higher gallons per capita per day (GPCD) during the summer months, because their numbers are not included in the population used to calculate GPCD. During the winter, the GPCD dips significantly and not solely as the result of reduced outdoor water use. Population numbers for areas such as this should not be entirely based on the census records, but should be adjusted by the water supplier to account for seasonal/transient populations.

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We appreciate the opportunity to comment on the proposed Regulatory Framework for the Extended Emergency Regulation, and look forward to continuing to work with the State Water Board.

Sincerely,



David J. Stoldt  
General Manager

cc: Honorable Felicia Marcus, Chair, and Members of the State Water Resources Control Board