

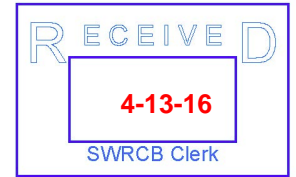


ALEXANDER R. COATE
GENERAL MANAGER

April 11, 2016

VIA E-MAIL: commentletters@waterboards.ca.gov

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



Subject: April 20, 2016 Water Conservation Workshop

Dear Chair Marcus and Members of the Board:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the potential revisions to the February 2016 Emergency Regulation.

EBMUD, like a number of other urban water agencies in California, was well prepared for the drought. Our prior conservation and infrastructure investments and planning efforts allowed us to provide a reliable supply of water and achieve the State's conservation mandate during the drought. We also appreciate the importance of conserving water at all times, regardless of the given hydrologic conditions. However, the increase in precipitation and snowpack in water year 2016 suggest that, for some portions of California, it is appropriate to lift the State's conservation mandate.

Staff at the State Water Resources Control Board (SWRCB) requested assistance in developing a framework for evaluating urban water agencies' supply conditions on an individual or regional level. The SWRCB is seeking input on screening criteria that would allow it to take actions to help agencies that are still in a water shortage condition. The framework should consider each agency's water supply portfolio and past performance in meeting the SWRCB target.

In consultation with other urban water agencies, EBMUD developed the attached template for the SWRCB's consideration. The proposed template is intended to facilitate the use of existing tools for reporting supply and demand, such as Urban Water Management Plans (UWMPs) and Water Shortage Contingency Plans (WSCPs), as state law already require water agencies to prepare and update these documents.

The template would allow the SWRCB to collect and evaluate agency data in a standard format. It includes data fields for an agency's June through October 2016 projected supplies and demands; WSCP implementation information; and past performance in meetings its

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SWRCB goal. The SWRCB could establish screening metrics, using the WSCP data to help prioritize its resources to help those agencies that are still most affected by drought. For agencies/regions that can demonstrate, through the template, that they no longer have a water shortage, the SWRCB should lift the conservation mandate and instead work with those agencies on coordinated public outreach in order minimize mixed messaging.

EBMUD looks forward to working with the SWRCB and other agency partners to continue to develop the template as a tool for consolidating data and evaluating the water supply situation across California. EBMUD staff is available to work with SWRCB staff on modifying the template as needed.

Thank you for your consideration and continued collaboration. If you have any questions, please contact Richard Sykes, Director of Water & Natural Resources at [rsykes @ebmud.com](mailto:rsykes@ebmud.com) or (510) 287-1629.

Sincerely,



Alexander R. Coate
General Manager

Attachment

cc: Tom Howard, Executive Director, SWRCB
Eric Oppenheimer, Chief Deputy Director, SWRCB
EBMUD Board of Directors

Agency:

Part I - Supply Assessment

Projected Supply and Demand	
	June-October, 2016
Program	% of Supply
Normal Year Water Supplies	
Water Recycling	#DIV/0!
Conservation	#DIV/0!
SWP Supply	#DIV/0!
CVP Supply	#DIV/0!
Non-Local Surface Water	#DIV/0!
Local Surface Water	#DIV/0!
Local Groundwater	#DIV/0!
Desalination	#DIV/0!
Total Normal Year Supplies	0
Drought Year Water Supplies	
Water Recycling	#DIV/0!
Conservation	#DIV/0!
SWP Supply	#DIV/0!
CVP Supply	#DIV/0!
Non-Local Surface Water	#DIV/0!
Local Surface Water	#DIV/0!
Local Groundwater	#DIV/0!
Desalination	#DIV/0!
Transfers	#DIV/0!
Exchanges	#DIV/0!
Total Drought Year Supplies	0
Total Water Supply	
Total Demand	
Customer Demand Reduction	#DIV/0!

Part II - WSCP Implementation

WSCP implemented?	Y/N
<i>If yes, what Stage?</i>	
<i>Customer Reduction %?</i>	
<i>Voluntary or Mandatory?</i>	

Part III - Customer Demand Reduction Past Performance (per SWRCB)

SWRCB Set Target Agency's Cumulative Savings to Date	
Target met?	Y/N