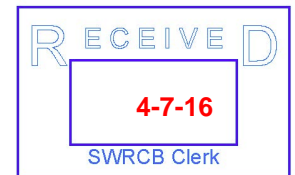


VALLEY OF THE MOON WATER DISTRICT

A Public Agency Established in 1962
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April 6, 2016

Via Email To: commentletters@waterboards.ca.gov

State Water Resources Control Board
Attn: Jeanine Townsend, Clerk to the Board
1001 I Street
Sacramento, CA 95814

RE: Comment Letter – Urban Water Conservation Workshop

Chair Marcus and Members of the Board:

The Valley of the Moon Water District (VOMWD) Board of Directors would like to thank you for hosting the upcoming Urban Water Conservation Workshop on April 20th and subsequent decisions regarding the statewide conservation mandates.

While VOMWD understands that during the drought the easiest means to achieve significant conservation was to impose statewide regulations; we can no longer condone the continued use of generalized statewide water supply and hydrologic conditions to drive local decisions regarding water supply. Statewide mandates fail to recognize significant investments made by water agencies prior to the drought and send the wrong message to our ratepayers especially in a hydrologic region where our water supply has been improving the past two years and now the local reservoirs are spilling and have multiple years of carryover.

VOMWD and our customers stepped up to the challenge during the 2014 voluntary conservation and 2015 state mandated conservation meeting and/or exceeding our targets both times. This however has not come without consequence. Due to the state mandate to conserve water, not based on local water supply conditions, our ratepayers are now feeling the undue consequence of their water district selling less water when local water supply conditions would have never triggered a mandatory level of conservation per VOMWD's Urban Water Shortage Contingency Plan. We acknowledge that our previous investments in local water supply, favorable weather patterns, conservation and customer relations may not reflect the state norm especially since we do not rely on any water from the state or central valley water projects.

It is time for local water decisions to be made at the local level again and be rest assured that VOMWD recognizes the importance of being stewards of this precious resource and will act accordingly should there be a local need for emergency conservation in the future.

The following is to specifically address the three questions of interest posed by the SWRCB:

1. *What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?*

Applicability sections should be modified to pertain only to agencies still facing water supply constraints.

2. *How should the State Water Board account for regional differences in precipitation and lingering drought impacts, and what would be the methods of doing so?*

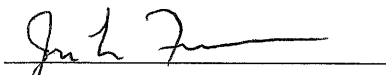
Agencies with 90% of normal water supply (surface reservoir or snow equivalent) shall be relieved of the statewide emergency mandate.

3. *To what extent should the State Water Board consider the reliability of urban water supplier supply portfolios in this emergency regulation?*

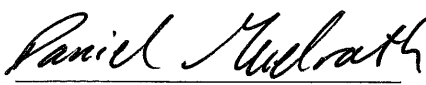
This is already covered in question two and water suppliers already have Urban Water Management Plans and Urban Water Shortage Contingency Plans that indicate under what water supply conditions a local water conservation regulation should or should not be imposed.

Thank you for taking the time to hear from water agencies in your effort to improve the conservation regulation.

Sincerely,



Jon Foreman
Board President



Daniel Muelrath
General Manager