



December 1, 2015

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: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus and Members of the Board:

The Bay Area Water Supply and Conservation Agency (BAWSCA) welcomes the opportunity to provide input as the State Water Resources Control Board (Board) considers the potential extension and modification of the Emergency Regulation for Statewide 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.

Among BAWSCA's member agencies are some of the lowest per capita water users in the state of California. During the current drought, 42% of BAWSCA's agencies had daily residential per capita water (GPCD) use of less than 65 gallons – 15% used less than 50 GPCD - during the months of June through September, normally the highest water use period of the year. Cumulatively, our member agencies have doubled the amount of required conservation savings during this same period and have met their combined total nine-month savings target in just four months.

As potential modifications to the emergency regulation are considered, BAWSCA urges the Board to recognize the constraints on some agencies to further reduce their water use. BAWSCA recommends that any review of new credits or adjustments be considered on a case-by-case basis, and that the granting of such modifications should not result in the raising of the Conservation Standard for any other water agency.

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,

Nicole Sandkulla
CEO/General Manager

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