



TUOLUMNE UTILITIES DISTRICT

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January 28, 2016

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State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100

Attn: Jeanine Townsend
Clerk to the State Water Board



RE: 2/2/16 Board Meeting (Conservation Extended Emergency Regulation)

Dear Members of the Board:

The Tuolumne Utilities District ("TUD") appreciates the effort and deliberation of the Board relative to the historic drought that has affected our State over the past several years. Though we recognize the difficult task balancing the disparate water supply considerations throughout the State, we nonetheless request that the Board consider certain modifications to the proposed regulations including clarification of vague provisions of the proposed Emergency Regulations:

- Agencies such as TUD, that have far exceeded the 2015 mandatory conservation levels, should receive an increased credit against 2016 conservation levels. The State Board's broad brush approach does not adequately address the loss of revenue, especially in economically challenged areas where rate increases are difficult to impose.
- The Board should remove caps on climate adjustments.
- Develop a specific measurable objective to determine if the Board's proposed emergency regulation should be subject to further downward adjustment or be rescinded in May.
- With many areas in the State receiving normal precipitation amounts, we suggest that the State provide funding to local agencies for public outreach and education to help citizens understand the context and length of the drought.
- The Board's final regulations should specifically define what will constitute the end of the drought.
- We request that the State prepare a public report reflecting water use reductions by all categories of users. This will help inform the public and provide education and discussion relative to water use other than that by urban water users only.
- Clarify in Section 865 (d)(2) whether the cumulative water use reduction continues from cumulative reduction figure achieved during the June 2015-February 2016 value or whether it is

reset under these draft regulations?

- Under Section 865 (f) (1) provide the Statewide Average ETo figure. From the example it appears to be 6.33, but is unclear.

Though the TUD and our customers will continue to conserve water in support of a statewide solution, we strongly urge the Board's consideration of the aforementioned items, especially for small rural water providers who do not enjoy the resources of larger urban water providers.

Thank you for your time and consideration to our questions and comments. If you have any specific questions, please contact me.

Very truly yours,



Thomas J. Haglund
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CC: Board of Directors