



May 4, 2015

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Ms. Felicia Marcus  
Chair, California State Water Resources Control Board  
1001 I Street  
Sacramento, CA 9581

RE: Comment Letter - Emergency Conservation Regulation

Dear Chairwoman Marcus:

On behalf of the California State Association of Counties (CSAC), I appreciate the opportunity to comment on the proposed drought emergency water conservation regulations. As indicated in our April 22 comment letter on the draft Drought Emergency Regulations and Approach, counties across the state have, and continue to, take various steps that respond to this growing crisis. Our comments then and now aim to build on these efforts by lending support to alternative approaches that recognize the uniqueness of counties as end-users of water. Unfortunately, none of the previously described approaches were incorporated into the proposed emergency regulations.

While we understand the urgency of the situation and the need to move swiftly, we reiterate our support for a revised regulatory package that includes the following components:

- Alternative credit system as proposed by San Diego County that would allow cities and counties served by multiple water suppliers to accrue credits for water conserved above and beyond one of its water supplier's directed conservation target that can then be transferred and used to comply with another water supplier's conservation target.
- Exemption for indoor water use in essential government facilities, such as jails and courthouses. At the very least, we urge you to adopt a guidance document that directs water suppliers to focus on exterior water use only at these types of county "public health and safety" facilities.
- Establishment of an "exception process" that would allow water suppliers to present to the Water Board specific information and evidence that would allow for modifications to address extenuating circumstances or unreasonable local impacts.

Thank you for your consideration of these comments and other comments offered by individual counties. Should you have any questions or need additional information regarding our comments, please do not hesitate to contact me at [kkeene@counties.org](mailto:kkeene@counties.org) or 916-327-7500, x-511.

Sincerely,

A handwritten signature in black ink that reads "Karen Keene".

Karen Keene  
Senior Legislative Representative

cc: Jeanine Townsend, Clerk to the Board, State Water Resources Control Board