

January 4, 2016

Ms. Kathy Frevert
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Sent via U. S. Mail and email: Kathy.Frevert@waterboards.ca.gov

SUBJECT: COMMENTS ON PROPOSED REGULATORY FRAMEWORK

Dear Ms. Frevert,

The City of Sacramento Department of Utilities (Sacramento) appreciates the opportunity to provide these comments on the State Water Resources Control Board (State Water Board) staff's *Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation*. We appreciate the efforts of staff and the State Water Board to follow through on the commitment to consider adjustments to the emergency regulation adopted in May 2015. Thoughtful consideration has been given to a number of proposals brought forth by water agencies and other stakeholders.

Sacramento provides a potable water supply from surface waters and groundwater, to more than 136,000 customer accounts, and approximately 486,000 residents. Under the current emergency regulation Sacramento is to reduce its water use by 28% in 2015. Sacramento is committed to increasing our water use efficiency and doing our part to conserve. Our residents have done a terrific job over the past seven months and have conserved 31 percent compared to 2013. That reduction has not come without a significant financial, resource and aesthetic burden of lost landscapes, including damage to our urban forest. We support the State Water Board staff proposal to add a climate adjustment into the extension of the emergency conservation regulation. We believe this modification recognizes the greater burden that was placed on our residents and provides a modest level of relief.

Though not included in this framework we ask that the board remain open to future consideration of giving credit to agencies that have invested in drought resilient supplies that include conjunctive use of groundwater and surface water. Conjunctive use expands the availability of potable water supplies and potential impacts to other users of groundwater can be mitigated through the existing water management mechanisms such as groundwater management plans.

Sacramento encourages staff and the Board to explicitly address in the extension of the emergency regulation, the need to reconsider the extended emergency regulation in April or May 2016 based on hydrologic conditions. Sierra snowpack, storage in the State's major reservoirs, projected runoff, cumulative precipitation, available local water supplies, and other factors can be used to assess the extent to which an ongoing drought represents an "emergency" statewide and in each region.

Residents throughout California stepped up to meet the Governor's 2015 call for a 25% reduction in water use. Continuing to expect these sacrifices without clear and convincing evidence of an ongoing

emergency will reduce the public's trust in state and local agencies and hinder both short and long term achievement of water conservation and efficiency goals.

Again, we thank and commend the State Water Board and staff for their efforts. We urge the State Water Board to adopt staff's climate adjustment proposal and to commit to a robust evaluation of the ongoing need for emergency measures in April/May 2016, based on an assessment of hydrological conditions.

Should you have any questions, please call Jim Peifer, Policy and Legislation Manager at (916) 808-1416.

Sincerely,



William O. Busath
Director of Utilities