



January 12, 2017

Delivered via e-mail to: commentletters@waterboards.ca.gov

The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Ms. Jeanine Townsend, Clerk to 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:

Thank you for the opportunity to provide comments for the upcoming Urban Water Conservation Workshop on January 18, 2017. The City of Santa Rosa is a retail water supplier serving approximately 173,000 residents in Sonoma County and receives its water supply from the Sonoma County Water Agency. In addition, the City is a member of the Sonoma Marin Saving Water Partnership (Partnership), which consists of the cities of Santa Rosa, Rohnert Park, Sonoma, Cotati, Petaluma, Town of Windsor, North Marin, Marin Municipal and Valley of the Moon Water Districts, Cal-American Water and the Sonoma County Water Agency and fully supports the comments made by the Partnership.

Santa Rosa has a long-standing commitment to water use efficiency and is fully committed to continued water use efficiency implementation in our community due to the vital role it provides in maintaining a reliable water supply. Since 1996 our total annual gallons per capita per day (gpcd), which includes water use for residential, commercial, industrial, institutional, irrigation as well as unaccounted for water, has been reduced by 47% from 162 gpcd in 1996 to 85 gpcd in 2015. The City has also been proactive in our response to previous water shortages through implementation of our Urban Water Shortage Contingency Plan, exceeding requested reductions in water supply from our customers, and preserving water supply to meet all needs. In response to the Emergency Regulations, the City has reduced water use by 24% from June 2015 through December 2016, compared to the 2013 baseline.

The State Water Board solicited input on three questions related to the potential adjustments to the Emergency Regulation. Below, please find our input:

- 1) **What elements of the existing May 2016 Emergency Regulation, if any, should be modified? Should the State Water Board wait until the hydrology for the current water year is known (April or later) before proposing adjustments to the current method for calculating current**

conservation standards? And, should the State Water Board allow suppliers to update or modify their conservation calculations (and if so, how)?

Santa Rosa receives our water supply from the Sonoma County Water Agency. Water supply for the Sonoma County Water Agency is derived from local surface water reservoirs – Lake Sonoma and Lake Mendocino. As of January 11, 2017, these local reservoirs have encroached into the flood pool, with Lake Sonoma at 126% water supply capacity and Lake Mendocino at 139% water supply capacity. Due to the current capacity of our local reservoirs and above average rainfall received to date, the hydrology for our region is known and our region is not currently experiencing a drought emergency. We suggest that the May 2016 emergency regulation should be rescinded for those areas with adequate supplies, and that no elements of the existing May 2016 Emergency Regulation be continued.

Should the existing May 2016 Emergency Regulation be extended, we suggest that the previously submitted self-certification stress tests continue to be used for determining any needed conservation standards.

2) Should the State Water Board account for regional differences in snowpack, precipitation and lingering drought impacts differently than under the current emergency regulation, and if so, how?

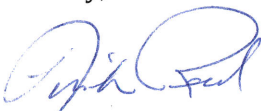
The State Water Board should account for regional hydrologic differences and should rescind the Emergency Regulation in those areas that are not currently experiencing a drought emergency.

3) Should the Board act now, or later if conditions warrant, to a conservation standard structure like the one the Board adopted in February 2016 to achieve a mandatory reduction in water use? Should the Board set a conservation floor, individually or cumulatively?

The State Water Board should act now to rescind the Emergency Regulation in those areas that are not currently experiencing a drought emergency. The State Water Board should not adopt a conservation standard structure like the one the Board adopted in February 2016 and should not set a conservation floor.

Thank you for the opportunity to provide input and comment for the upcoming Urban Water Conservation Workshop. We look forward to continuing to work with the State Water Board on future water conservation efforts.

Sincerely,



Linda Reed
Interim Director – Santa Rosa Water