

General Manager

Robert S. Roscoe, P. E.



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Public Comment
Urban Water Conservation Workshop
Deadline: 1/12/17 12 noon

January 12, 2017

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814



via email to: commentletter@waterboards.ca.gov

SUBJECT: Comment Letter – Urban Water Conservation Workshop

Dear Ms. Townsend:

Sacramento Suburban Water District (District) appreciates the opportunity to comment on the Notice of Public Workshop regarding the Emergency Regulation for Statewide Urban Water Conservation dated January 6, 2017. The District is a County Water District that serves over 178,000 customers in Sacramento County. Collectively, the District operates over 80 groundwater wells and has access to surface water from both Folsom Lake and the American River if specific hydraulic conditions are met.

Water supply conditions have drastically improved since the Emergency Regulation was first adopted in May 2015. In many parts of the State, precipitation levels are now at or above average historical levels, reservoirs are spilling to ensure flood protection, and snowpack is at or above historical averages. Exhibit 1 attached is a copy of the current summary water conditions plot from the Department of Water Resource Data Exchange (CDEC) for the Sacramento 8-station index showing current water conditions are the wettest on record. We believe that current conditions no longer constitute a statewide drought emergency that calls for State intervention in local water management decisions. We recommend the State Water Resources Control Board (State Water Board) allow the current Emergency Regulation to expire in February 2017. We recognize that some limited areas of the State may still face potential water shortages in 2017, and urge the State Water Board to focus on those communities that require assistance in meeting their water needs.

In May 2016, the State Water Board adopted an Emergency Regulation that focused on a demonstration by water suppliers of whether they had adequate supplies to respond to three additional dry years. Unfortunately, this new standard was widely misinterpreted as “backsliding” from the prior mandatory conservation targets, when in fact it represented a sound water management approach given improved conditions. In light of current hydrologic conditions, there is no justification to consider a return to mandatory conservation targets on a statewide basis. Instead, the most productive action now would be to shift our focus to developing a credible longer term approach to planning for drought and improving water use efficiency over time.

Since the enactment of the state mandated water conservation targets in June 2015, District customers have saved 27.3%. During the period of June 2016 to date, the District set a voluntary Water Conservation Goal of 10% and customers saved 22% demonstrating the District’s ability to aggressively



conserve in times of real or potential shortage. We are well situated to respond quickly if our region or the State should return to severe drought conditions in the future. In addition, our District has conjunctively banked over 200,000 acre feet of water in our local groundwater basin over the past 15 years, representing over a 6-year supply.

Furthermore, the State's current water supply conditions, including flood control releases from major reservoirs, highlight the necessity of embracing all of the actions in the California Water Action Plan. For example, expanding water storage capacity and promoting safe and effective water transfers would allow California to take advantage of these recent storms. To truly prepare for the effects of climate change, the State needs to implement a portfolio of solutions, in which conservation is but one important action among many others.

The District is dedicated to preparing for future droughts and advancing water supply reliability through a balanced approach. That approach includes the continued development and continued use of our conjunctive use system, which allows the District to reduce groundwater pumping when surface water is abundant. We believe continuing to extend emergency conservation regulations when local agencies are fighting floods in the wettest year on record causes an extreme problem with public messaging. We look forward to working together to implement the comprehensive California Water Action Plan. Let's move on from crisis management and focus on building a sustainable and resilient future.

Respectfully,



Robert S. Roscoe, P.E.

General Manager

Sacramento Suburban Water District

Exhibit 1

https://cdec.water.ca.gov/cgi-progs/products/PLOT_ESI.pdf

January 11, 2017

