



April 29, 2015

Via email to Jessica.Bean@waterboards.ca.gov

State Water Resources Control Board
Felicia Marcus, Chair
1001 I Street
Sacramento, CA 95814

DRAFT REGULATIONS IMPLEMENTING 25% CONSERVATION STANDARD

Dear Chair Marcus and Board Members:

As you are well aware, California is currently in a multi-year drought which is causing havoc on water supplies up and down the State. The City of Stockton would like the Board to strongly consider the acceptance of urban water suppliers, whose supplies include groundwater, to apply for inclusion in the four percent reserve tier, if such agencies can demonstrate that they have a minimum of a four year supply, they do not rely upon imported water and their groundwater supplies recharge naturally.

The City has had the opportunity to review the draft emergency conservation regulations (Draft Regulations) circulated by the State Water Resources Control Board (SWRCB) and are in favor of the SWRCB adopting the special reserved four percent tier. It will allow local agencies to monitor their use and manage as they best see fit. If the agency has been doing their due diligence in respect to managing their surface water and ground water supplies, as well as promoting conservation, it is not our opinion that they should be punished for proactively being sustainable.

If these agencies are already showing proactive sustainability, it would be highly unlikely that continued voluntary conservation measures would not be implemented to help achieve overall conservation goals set forth in the Governor's Executive Order.