



January 28, 2016

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

Subject: 2/2/16 Board Meeting – Item 7 (Conservation Extended Emergency Regulation)

Dear Chair Marcus and Members of the Board:

Thank you for the opportunity to provide comments on the proposed Extended Emergency Water Conservation Regulation (Regulation). The City of Santa Rosa is a retail water supplier serving approximately 170,000 residents in Sonoma County and receives its water supply from the Sonoma County Water Agency. Santa Rosa has a long-standing commitment to water conservation and is fully committed to further water conservation implementation in our community. Due to Santa Rosa's water conservation efforts, since 1996 our total annual gallons per capita per day (gpcd) has been reduced by 47% from 162 gpcd in 1996 to 86 gpcd in 2015.

Santa Rosa appreciates the changes that have been proposed in the Regulation, taking into account the variability in climate and population growth and providing credit for drought-proof supplies. Santa Rosa requests that additional changes be incorporated into the proposed Regulation to allow for a Regional Compliance option and to provide a 4% Conservation Standard for regions that have water storage at or above 90% reservoir capacity on April 1, 2016.

Regional Compliance

The City continues to support the inclusion of a Regional Compliance option in the proposed Regulation. Santa Rosa is a member of the Sonoma Marin Saving Water Partnership (SMSWP) 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. The SMSWP was established in 2010 to work collaboratively on water conservation implementation. The SMSWP formed a regional alliance to comply with SBx7-7, the Water Conservation Act of 2009. Since June 2015, the SMSWP has been tracking water use in comparison to the current Regulation and as region we have determined a Conservation Standard of 19% and are currently exceeding our current Conservation Standard by 5%, saving a total of 24% in comparison to the 2013 baseline. Santa Rosa believes that the inclusion of a voluntary Regional Compliance option would allow the State to achieve required water savings while allowing water agencies to leverage resources and achieve cost-effective, regionally consistent public outreach.

Water Supply Storage Conservation Standard

Water supply for the Sonoma County Water Agency, the City's wholesale water supplier, is derived from local surface water reservoirs – Lake Sonoma and Lake Mendocino. As of January 26, 2016, water supply in the local reservoirs is nearing capacity, with Lake Mendocino at 97% and Lake Sonoma at 93%. Santa Rosa is pleased that State Water Board staff is committed to monitoring and evaluating available data on reservoir storage levels, intends to report back to the State Water Board in March and April 2016, and if conditions warrant, promptly bring a proposal to adjust or eliminate the Regulation. In recognition of local water storage conditions, Santa Rosa requests that the Regulation include a trigger enabling the existing Conservation Standard to be reduced to a 4% Conservation Standard when water supply, as determined by reported water storage levels, is sufficient to meet the region's needs.

Thank you for the opportunity to provide these comments. We look forward to continuing to work with the State Water Board on future water conservation efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "D. M. Guhin", with a long horizontal flourish extending to the right.

David M. Guhin
Director – Santa Rosa Water