



Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814

January 28, 2016

Dear Ms. Marcus,



Board of Directors
Al E. Fox
Division 1
Jeffrey C. Brown
Division 2
Timothy H. Hoag
Division 3
Eugene F. West
Division 4
Terry L. Foreman
Division 5
General Manager
Tony L. Stafford

This letter is the latest installation in our ongoing dialogue about the SWRCB's emergency regulations, and we appreciate the Board's engagement and attention. Having recently constructed a brackish groundwater desalter, we were glad to see SWRCB staff recommend an adjustment for new local drought-resilient supply, but we believe the methodology of that adjustment could be improved.

Our January 4th letter encouraged the exclusion of drought-resilient supplies from the conservation-target calculation, and we reiterate that recommendation today. Simply deducting drought-resilient supplies from the calculation, rather than reducing the agency's conservation tier, both advances the state's interests and maintains the pressure on those customers that have not achieved the conservation target.

Camrosa's Round Mountain Water Treatment Plant (RMWTP), a 1 MGD brackish groundwater desalination facility, was built in 2014, with \$2.3 million of state money through a Prop 84 grant. It has significantly decreased Camrosa's dependence on SWP water in the drought; since June, it has produced 9.15 percent of Camrosa's potable water—water that otherwise would have come from the Delta.

Over the drought reporting period, Camrosa has reduced 23 percent—admittedly short of our 32-percent conservation target. Under the proposed framework, we could reduce our target by eight percent, to 24, and with a stroke of the pen go from being nine percent from our goal to only one. If the RMWTP supply were simply deducted from our conservation-target calculation, we would be at a cumulative 31-percent reduction since June; the same distance from our conservation target, yes, but we would still have the 32-percent benchmark to encourage conservation. More than half of our residential customers are meeting or exceeding their goal, and if they suddenly found themselves far below a new, more-lenient goal, it's no stretch to imagine they might add a minute or two onto their showers, or eek a couple more inches of water out of their sprinklers.

Excluding the drought-resilient supply from the conservation-target calculation and keeping Camrosa in Tier 8, at 32 percent, would allow us to continue using that target to encourage our customers, especially those that aren't meeting their goals, to tighten their belts.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads 'Tony Stafford'.

Tony Stafford, General Manager