



Home of
Travis Air Force Base

CITY OF FAIRFIELD

Founded 1856
PUBLIC WORKS DEPARTMENT

Incorporated December 12, 1903

February 6, 2017



COUNCIL

Mayor
Harry T. Price
707.428.7395

Vice-Mayor
Chuck Timm
707.429.6298

Councilmembers
707.429.6298

Pam Bertani

Catherine Moy

Rick Vaccaro

•••

City Manager
David A. White
707.428.7400

•••

City Attorney
Gregory W. Stepanicich
707.428.7419

•••

City Clerk
Karen L. Rees
707.428.7384

•••

City Treasurer
Oscar G. Reyes Jr.
707.428.7498

Via email to commentletters@waterboards.ca.gov

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

Subject: Item #9 – Consideration of a proposed Resolution amending and readopting drought-related emergency regulations for the urban water conservation to implement Executive Orders B-29-15, B-36-15, and B-37-16

Dear Ms. Townsend, Chair Marcus, and Board Members:

The City of Fairfield (Fairfield) has consistently expressed its concerns about the current Emergency Water Conservation Regulations and their implementation as provided for in past comment letters to the State Water Resources Control Board (SWRCB).

At this point in time, all facets of the Emergency Regulations should be eliminated. A water supply shortage has not existed for the City of Fairfield at any point since the early 1990's. Since that time, the City and our neighboring communities have been able to manage our water supplies successfully without State intervention. The SWRCB's insistence on a blanket regulatory approach that did not consider the individual water supplies of different regions of the State was injurious to the City and its residents (as well as numerous other water agencies and their customers). The SWRCB's Emergency Regulations caused substantial economic losses to the City in 2015 by reducing water revenues and preventing water intensive industry from locating in Fairfield. Fairfield was denied the benefit of its sound water management practices, long-term planning and financial investment and was effectively forced to forego utilizing its available water supply resources. While the City appreciates the continuation of the "stress test" approach first included in the Emergency Regulations in 2016, there remain components of the Emergency Regulations that would subject the City to continued unnecessary regulatory burden. Most importantly, in the absence of a drought emergency, the continuation of the Emergency Regulations would be irresponsible and arguably illegal.

DEPARTMENTS

City Manager's Office
707.428.7400

•••

Community Development
707.428.7461

•••

Community Resources
707.428.7465

•••

Finance
707.428.7498

•••

Fire
707.428.7375

•••

Police
707.428.7362

•••

Public Works
707.428.7485

Letter to Jeanine Townsend, State Water Resources Control Board
Re: Item #9 Consideration of proposed Resolution
February 6, 2017
Page 2

The drought is officially over in Northern California as well as in virtually all other areas of the State. The SWRCB's rationale for amending and readopting the Emergency Regulations are baseless and without merit. The State was out of a "drought emergency" after last winter, and to continue to make claims that drought conditions exist when all factual rainfall, snowpack and reservoir storage level data indicates otherwise is disingenuous and ruins the State's credibility. Therefore, the continuation of any "emergency" water conservation regulations is inappropriate and the proposed Resolution should not be passed.

Fairfield will continue its long standing practices of prudently managing its water resources moving forward, with or without SWRCB regulations, but strongly encourages the SWRCB to declare an end to the "drought emergency" and allow local water suppliers to return to managing their water supplies independent of the State.

Sincerely,



GEORGE R. HICKS
Director of Public Works

GRH:kmb