

Felicia Marcus, Chair
State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
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Ms. Marcus:

Thank you for the opportunity to reply to the Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation, released December 21, 2015. As we mentioned in our letter of December 2, and at the State Board workshop on December 7, Camrosa's greatest concern regarding conservation targets is that the calculation does not account for the desalination of brackish groundwater.

Camrosa completed the Round Mountain Water Treatment Plant (RMWTP), a 1 MGD reverse osmosis desalination facility, in 2014. The purpose of building it was to create, in the language of the framework, a "drought resilient source of supply" that would reduce our dependence on the State Water Project. Seeing the benefits of such a project, the state of California pitched in \$2.3M, through a Proposition 84 grant, to help us build it.

And it worked; in 2015, the RMWTP reduced Camrosa's demand on the State Water Project by 519 acre feet, or roughly ten percent. Supply from the RMWTP is drawn from a perched aquifer where TDS levels exceed 1,500 mg/L—far too salty for drinking water and even higher than local farmers can use on their crops—and the water does not communicate with other basins, so it is not available for any other use. Therefore, after treatment, it is a truly "new" source of water supply.

We write today to request and recommend that you expand the definition of "drought resilient sources of supply" to include brackish groundwater desalters. Rather than a "one-tier (four percentage point) reduction to the conservation standard" that the framework recommends, we suggest deducting whatever volume the drought-resilient source produces from the conservation-target calculation, much like Commercial Agricultural Water is reported and then, pending fulfillment of several criteria, subtracted from Total Monthly Potable Water Production. We could easily supply documentation demonstrating the RMWTP's production, much as we certified the commercial agricultural accounts that we currently subtract as part of our conservation-target calculation.

Thank you again for the opportunity to comment. I'm happy to answer any questions you, the Board, or staff might have about these comments or the RMWTP.

Sincerely,



Tony Stafford, General Manager