



CITY OF  
**FOLSOM**  
DISTINCTIVE BY NATURE

January 6, 2016

Kathy Frevert  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Transmitted by email to: [Kathy.Frevert@waterboards.ca.gov](mailto:Kathy.Frevert@waterboards.ca.gov)

Dear Ms. Frevert,

On November 13, 2015, Governor Brown issued Executive Order B-36-15 calling for an extension of urban water use restrictions until October 31, 2016, should drought conditions persist through January 2016. On December 7, 2015, the State Water Resources Control Board (Water Board) held a public workshop to solicit input on elements of the existing emergency regulation, if any, that should be modified. As part of this workshop, various modifications were proposed by water agencies throughout the state. Below are the City of Folsom's (City) comments to the *Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation*.

The City supports modifications of the emergency regulations that allow for various adjustments to be calculated based on climate and growth. A climate adjustment allows for water suppliers located in the warmest regions of the state up to a four percent conservation reduction based on their service area evapotranspiration. This adjustment recognizes the inequitable burden that was placed on water customers in warmer regions of the state, but this only provides a modest level of relief.

The growth adjustment factor will also provide modest relief to those water suppliers in order to account for growth and new service connections since 2013. This adjustment factor will allow water suppliers to account for residential and non-residential water use due to growth within the water supplier's service area between 2013 and 2015. This provides an equitable allowance statewide for not only population growth, but for service connection growth for the non-residential sector.

In addition to conservation adjustments outlined in the proposed framework, the City recommends that the State Water Board consider modifications to the language that will allow additional conservation adjustments based on statewide hydrologic conditions. The proposed framework references drought conditions through January 2016, but there should be consideration of conditions after January 2016 before determining whether conditions

represent an “emergency.” A practical approach would be to use the April 2016 statewide snow survey to address the hydrologic conditions and whether the extended emergency regulations, as written, are required.

The City continues to stress the importance of the prioritization of the available funding to those water suppliers that are assigned the upper compliance tiers to support their greater contribution to the statewide target. The level of public outreach messaging, media engagement, conservation programs and enforcement needed to achieve these conservation standards will require additional funding on top of what was spent in 2015.

Thank you for the opportunity to comment on the draft regulations and we look forward to hearing the Board’s response to our comments. If you have any questions, please contact me at (916) 355-7201.

Sincerely,



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