



Environmental Utilities
Administration
2005 Hilltop Circle
Roseville, California 95747



VIA EMAIL: commentletters@waterboards.ca.gov

January 12, 2017

Felicia Marcus, Chair
Attn: Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95614

Re: Comment Letter – Urban Water Conservation Workshop

Dear Ms. Marcus,

You and your fellow State Water Resources Control Board (SWRCB) members will soon have the opportunity to hear from SWRCB staff and water interests on various perspectives related to the Emergency Urban Water Conservation Regulations, which will expire on February 28, 2017, and whether those regulations should be extended; and, what those newly extended emergency regulation might require of local agencies relative to a continuation of state conservation goals.

In our assessment, SWRCB staff have framed this workshop and discussion around three questions which we believe lead to a pre-disposed conclusion that an extension of the emergency regulations, in some form, is still needed. We respectfully disagree with the conclusion that an extended emergency regulation is still needed, based on improved hydrologic conditions over the past few months, which we detail below.

While a case could be made that drought conditions may exist in parts of the Central Valley and southern California, it is hard to deny, by any measure, that drought conditions are no longer present in northern California.

As examples of this, as of the writing of this letter, here are the conditions we are experiencing in the Sacramento region that demonstrate that an extended emergency conservation regulation is no longer needed:

- The Sacramento region has seen a series of significant and record-breaking precipitation events, including a once in a decade storm event, that has significantly increased flow into key reservoirs like Shasta, Folsom and Oroville.
- Snowpack that will feed water to these key reservoirs over the coming months has also improved with the North, Central and Southern Sierra ranges at 111%, 130% and 171% percent of normal, respectively (January 10, 2017).
- Folsom Reservoir, part of Roseville's water supply, is at 139% of average (January 12, 2017) or 674,000 acre-feet (AF). This time last year, Folsom Reservoir was at 265,000 AF.

- Water supply at the Placer County Water Agency's Middle Fork Project, which is in the upper watershed that feeds Folsom Reservoir and an additional source of water supply for Roseville, is at 186% of average (January 10, 2017) as well.
- Additionally, the Middle Fork Project's French Meadows Reservoir is spilling and the Hell Hole Reservoir has risen over 35 feet since Sunday morning with a little over 7 feet remaining before it would spill (January 10, 2017).
- Over the past week, Folsom Reservoir has been operating in flood control mode with up to 104,000 cubic feet per second flowing into Folsom Reservoir and releases of up to 58,000 cubic feet per second due to record-setting storm events (January 12, 2017);
- Additionally, Shasta and Oroville Reservoirs have also seen significant improvement at 126% and 117% of average, respectively (January 12, 2017).

As with any matter before you, we encourage you and your fellow board members to formulate a decision that is practical, defensible and data driven. Continuing to treat the past drought as a continuing emergency no longer holds any credibility with the water community or with the public that we serve.

If an extension of the emergency regulation continues or is somehow increased, despite what the hydrologic results show, it will damage the credibility of the State of California and local water agencies that that State relies upon to encourage local water users to reduce water use and conserve when the next drought returns.

With this said, we strongly encourage the SWRCB to direct staff to let the emergency regulation expire, and instead focus the State's limited resources to support and partner with local water agencies in advancing long-term water use efficiency and supporting the development of water storage and reuse infrastructure statewide which will allow California to become more resilient in future droughts.

Thank you again for providing this opportunity to comment on this issue, if you have additional questions, please feel free to contact Sean Bigley at (916) 774-5513.

Sincerely,



Richard D. Plecker, P.E.
Environmental Utilities Director

cc: Roseville City Council
Senator Jim Nielsen
Assemblymember Kevin Kiley
John Woodling, Executive Director, Regional Water Authority