



Environmental Utilities
Administration
2005 Hilltop Circle
Roseville, California 95747

(4/20/16) Public Workshop
Urban Water Conservation
Deadline: 4/14/16 by 12 noon



April 13, 2016

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

Transmitted via email to the Clerk of the Board at commentletters@waterboards.ca.gov.

Re: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus and Board Members D’Adamo, Doduc, Moore and Spivey-Weber:

Thank you for the opportunity to comment ahead of the April 20 workshop regarding the State’s Drought Emergency Regulation (regulation) in response to recent increases in precipitation, snowpack and significant water supply improvements, specifically in northern California.

We recognize that the State Water Board has an obligation to look at the entire state’s situation. However, the present hydrologic conditions in northern California make it imperative that the State Water Board promptly rescind the regulations for the City of Roseville whose water supply conditions are at above normal conditions, thankfully, due to favorable and productive weather over the past several months.

A delay or failure to do so will risk not just the public's cooperation, but also the very credibility of local agencies such as the City of Roseville, who must enforce the state's mandates. It is time to return local control to agencies like the City of Roseville that have attained these above normal water supply conditions.

The request to rescind the regulations is based on the following facts regarding our local water supply conditions:

- Folsom Reservoir, the City of Roseville’s key water supply source, is well above average storage as of April 11 at 114 percent of historical average, far exceeding storage levels seen in 2013, 2014, and 2015. In fact, releases as high as 20,000 cubic feet per second (cfs) have been necessary to ensure that Folsom Reservoir can serve its flood protection purpose. Folsom Reservoir, as an element of the Central Valley Project, must be operated in conjunction with Shasta and Oroville Reservoirs which are at above average storage, 109 percent and 116 percent, respectively, as of April 11.

- On April 1, the Bureau of Reclamation, in its preliminary north of Delta Municipal and Industrial water supply allocation, stated that it will provide the City of Roseville with 100 percent of its Central Valley Project supplies from Folsom Reservoir for the remainder of this water year.
- The City of Roseville also has additional surface water supply contracts upstream of Folsom Reservoir from Placer County Water Agency's Middle Fork Project. As of April 5, those Middle Fork Project inflows are at 145 percent of the historical long-term average and are abundant.
- The northern Sierra snowpack, which will fill and replenish Folsom Reservoir over the spring and summer, was at 97 percent of normal on April 1, 2016. Similarly, the 8-Station Precipitation Index was at 123 percent of average on April 5, 2016.
- While the City of Roseville only relies upon groundwater as a back-up supply in times of extreme drought or emergency, our reliance upon groundwater has been very limited (used only for a couple of months in 2014). Similarly, unlike other regions in the state, the groundwater basin that underlies the western portion of Placer County is healthy and has sustained little impact as a result of this drought due to proactive management of the groundwater basin by local agencies.

The City of Roseville and the greater Sacramento region have taken this drought seriously from the start taking early action to respond to this severe drought. As a result, the Sacramento region achieved a 19 percent decrease in water use in 2014, and a 30 percent decrease in water use in 2015.

In 2015, Roseville exceeded what the state had required by achieving a 34.1 percent water conservation result for the compliance period ending February 2016. This was in excess of the required 28 percent conservation target set for Roseville.

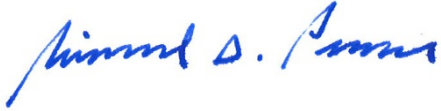
As these state's requirements are relaxed or rescinded, Roseville will remain committed to continuing to invest and promote the continued efficient use of water in our city, as we have done for many years. We have shown that commitment to water use efficiency before and during the drought; and that commitment to water use efficiency will not waiver moving forward.

Therefore, we ask that based on the City of Roseville's significantly improved water supply conditions detailed above, that the State Water Board promptly rescind the state's emergency drought requirements upon Roseville, including Roseville's state mandatory water conservation target. Based on our above normal regional water supply conditions, our city and our customers know these state requirements can no longer be justified, as a drought emergency no longer exists in our region.

Additionally, as was requested in the April 20 workshop notice, we have attached answers to the three questions posed in that notice.

Thank you for the opportunity to provide our comments. Please let us know if we can provide any additional information that can help the State Water Board concur with our conclusion that a drought emergency no longer exists for Roseville and the Sacramento region.

Sincerely,



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

cc:

Members of the Roseville City Council
City Manager Rob Jensen
Senator Jim Nielsen
Assemblywoman Beth Gaines
John Woodling, Executive Director, Regional Water Authority

Response to questions in April 20 Workshop Notice

To respond specifically to the questions posed in the Notice of Public Workshop, see comments below.

1) What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?

The mandatory nature of the water conservation requirements should be rescinded in areas of the state that are experiencing relatively normal or better hydrologic conditions and normal or above normal local water supplies. The focus in these areas of the state should return to long term improvements in water use efficiency.

2) How should the State Water Board account for regional differences in precipitation and lingering drought impacts, and what would be the methods of doing so?

The State Water Board should use available hydrologic data for each region to evaluate whether the drought still represents an “emergency” in a given region. This could be accomplished on a hydrologic region level as defined by the California Department of Water Resources (DWR). DWR publishes monthly water supply condition data in Bulletin 120 that is organized by hydrologic region and includes precipitation, snow water content, reservoir storage and current and forecasted runoff. The State Water Board can use this information to assess each hydrologic region and decide which regions are recovering and which regions are still experiencing severe drought conditions.

3) To what extent should the State Water Board consider the reliability of urban water supplier supply portfolios in this emergency regulation?

The reliability of a water supplier’s portfolio should be the fundamental element in considering mandatory water conservation during drought. Unfortunately, it has been only minimally considered during the current drought emergency. While we would prefer a specific assessment of a water supplier’s conditions, considering the temporary and limited nature of the Emergency Regulation and the need for immediate action, submittal and evaluation of 411 different supply portfolios for reliability may not be a workable strategy to meet the State Water Board’s desire to address changing water supply conditions.