



April 13, 2016

The Honorable Felicia Marcus, Chair  
 and Members of the State Water Resources Control Board  
 c/o Jeanine Townsend  
 Clerk of the Board  
 State Water Resources Control Board  
 1001 I Street, 24th Floor  
 Sacramento, CA 95814

Dear Chair Marcus and Members of the Board:

Thank you for the opportunity to comment on the Emergency Water Conservation Regulations. We appreciate the State Board’s proposal to take water supply into account when looking at whether and how to continue the regulations. We agree with your approach to base your decision on local or regional reliability information.

San Francisco and the customers of the Hetch Hetchy Regional Water System have met and exceeded the conservation targets set by the State Board. In 2015, the City of San Francisco saved almost 13% over its 2013 use, exceeding its 8% conservation target. The total Hetch Hetchy Regional Water System reduced deliveries by 19.2% in 2015 compared to the 2013 baseline, which corresponds to 16 billion gallons of water saved in just that calendar year. Of the 24 Wholesale Customers served by SFPUC that have a conservation target, all but one has exceeded the target, and some have reached savings of twice their conservation target or more.

Though we recognize the difficulty of assessing the supply situation of 411 different suppliers, we also think that mandating a regional approach to supply assurance over-simplifies the diverse supply portfolios of individual water suppliers. In the Bay Area, the largest utilities derive their supply from such varied sources as the State Water Project, Central Valley Project, individual supply systems such as the Hetch Hetchy and Mokelumne systems, groundwater, local surface water, and various other smaller sources such as recycled water and brackish groundwater desalination. From a supply perspective, it does not make sense to treat us as a region. We support giving suppliers the option of reporting on supplies regionally or individually.

**Edwin M. Lee**  
 Mayor

**Francesca Vietor**  
 President

**Anson Moran**  
 Vice President

**Ann Moller Caen**  
 Commissioner

**Vince Courtney**  
 Commissioner

**Ike Kwon**  
 Commissioner

**Harlan L. Kelly, Jr.**  
 General Manager



Regardless of our supply situation and whether or not the emergency conservation regulations continue, we will continue to spread the message that it is important to conserve water. Our ongoing work to promote conservation over the course of the last two decades is one of the reasons our per capita consumption is so low, and we commit to continuing those programs and messaging into the future.

We look forward to working with you to implement the updated conservation regulations.

Sincerely,

A handwritten signature in black ink, appearing to read 'SR Ritchie', written in a cursive style.

Steven R. Ritchie  
Assistant General Manager, Water

Cc: Nicole Sandkulla, BAWSCA