

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](mailto:commentletters@waterboards.ca.gov).

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

The City of Sacramento (Sacramento) thanks you for the opportunity to comment on potential adjustments to the February 2016 Emergency Regulation and possible State Water Resources Control Board (State Water Board) action in response to recent increases in precipitation and corresponding water supply improvements. Sacramento looks forward to redeploying its resources from addressing the emergency to continue working on long term water use efficiency efforts.

We recognize both the challenge and the need of the State Water Board to consider water supply conditions throughout the State while assessing the drought. We would like to inform the State Water Board on current water supply conditions, which are as follows:

- Folsom Reservoir, one of the key sources of supply for Sacramento, is well above average storage for April 1<sup>st</sup>, far exceeding storage levels seen in 2013, 2014, and 2015. In fact, releases as high as 20,000 cubic feet per second (cfs) were needed recently to ensure the reservoir can serve its flood protection purpose.
- Shasta Reservoir, another source of water for Sacramento is making flood control releases too and has similar above average storage.
- The 8-Station Precipitation Index was at 122% of average on April 6, 2016.
- Sacramento obtains a portion of its water supply from groundwater. Groundwater monitoring shows that levels in the basins underlying Sacramento County are recovering and experienced only minor declines during the drought that are well within the established groundwater management objectives for water levels in the basins underlying Sacramento County. Significant recharge has already occurred this year, and the decline in groundwater levels has ceased, and is recovering.

Sacramento took early action to respond to the local water supply conditions. On January 14, 2014, Sacramento adopted a resolution to mandate water use reductions of 20 percent. This was followed shortly by the Governor's Emergency Declaration. Sacramento's residents recognized the severity of the drought, achieving a 20.2 percent decrease in water use between February and December 2014. Current hydrologic conditions make it very advisable that the State Water Board recognize that the Sacramento region can no longer be considered to be facing a drought emergency. Failure to take action, as early as practicable, will likely strain the credibility of both the State Water Board and local water suppliers, and may be counterproductive to long term water efficiency improvements.

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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. 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.

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 an ongoing statewide drought in California does not represent an emergency for the Sacramento region. We look forward to continuing this important and timely discussion.

If you have any questions, please call Jim Peifer at (916) 808-1416.

Sincerely,



William O. Busath  
Director of Utilities