



CITY OF SANTA MARIA
UTILITIES DEPARTMENT
Business Services • Regulatory
Compliance

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April 13, 2015

Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95818

Sent Via Email: Jessica.Bean@waterboards.ca.gov

**SUBJECT: COMMENT LETTER TO MANDATORY CONSERVATION PROPOSED
REGULATORY FRAMEWORK, RELEASED APRIL 7, 2015**

Dear Ms. Marcus:

The City of Santa Maria (“City” or “Santa Maria”) understands the serious water challenges facing the State of California. The City supports the Governor’s commitment to reducing water use statewide, and appreciates the State Water Resources Control Board’s (“Water Board”) efforts to develop and adopt regulations to implement the Governor’s April 1, 2015, Executive Order B-29-15. The City appreciates the opportunity to comment on the Proposed Regulatory Framework for Mandatory Conservation (“Framework”).

Santa Maria’s leadership has shown significant foresight to plan for and guarantee a reliable water supply for its citizens. Historically, the City has pumped water from the Santa Maria Valley Groundwater Basin as its primary water supply. The City began receiving State Water Project (“SWP”) water from the Central Coast Water Authority via the Coastal Branch Aqueduct in 1997 to augment local groundwater supplies. Currently, the City is operating under a court-ordered Stipulation, under which Santa Maria derives its water supply from local groundwater, purchased water from the SWP and associated return flows recaptured from the Basin, and a share of the yield of the Twitchell Reservoir operations.

The City has already reached the state-mandated goal of conserving 20 percent of its water supply by the year 2020 under California’s “20x2020” Water Conservation Plan. This water savings achievement occurred well in advance of the target year. (Please see attached chart showing this accomplishment.) In addition, the City has numerous programs in place to help both businesses and residents conserve water, and consequently has one of the lowest gallons-per-capita-per-day water use rates in Santa

Barbara County. The City advocates water conservation through a tiered rate structure, a fixed-base meter program (used to notify customers of leaks since 2009), a water conservation specialist who conducts water audits and identifies methods for customers to reduce water use, a program that distributes devices to reduce water use in homes and businesses, and other voluntary water conservation efforts.

In accord with the Water Board's Stage 1 of the Water Shortage Contingency Plan, the City prohibits potable water irrigation of ornamental landscapes or turf from 12 p.m. to 4 p.m. Along with Santa Maria residents and businesses, the City must abide by new state-imposed requirements of the Water Board established on March 17, 2015. Thanks to these efforts and water management operations, the City has ample water resources to supplement reduced SWP deliveries to provide 100 percent of water delivery this year, without presenting any threat to the groundwater basin.

The City has concerns regarding methodologies, compliance assessment, and revenue implications related to the Framework. The City offers the following comments and suggestions for development of the forthcoming regulations:

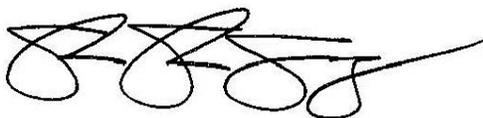
1. The Water Board should provide clear formulas that ensure all calculations are standard across residential, commercial, industrial, institutional and agricultural sectors, and that the calculations are applied consistently among all agencies. This should include clear guidance on calculating R-GPCD to ensure that all agencies meet the appropriate reduction target, and clarification on which sectors should be included or excluded in the agency's assessment.
 - a. If the Water Board determines that agriculture is exempt from the water reduction requirement, then the processing of agricultural products should also be exempt. Many agriculture-related processing sites in Santa Maria have very limited landscaping, and thus only offer minimal opportunities for water savings.
2. The Water Board should provide clear targets for assessment of compliance.
 - a. While encouraging reduction of commercial, industrial, and institutional ("CII") sectors, there is no specific target for reduction. The State should provide clear guidance on the targets for these sectors if the Water Board intends for agencies to enforce compliance. If these sectors are not to be treated as residential (and included in the R-GPCD), then the Water Board should clarify what defines compliance for these sectors. Without specific guidance from the Water Board on these targets, agencies should not be responsible for compliance.
 - b. The Framework proposes to assess "CII sector customers and actions taken by urban water suppliers to reduce CII sector use." The City is not aware of any compliance required by the industrial sector. In fact, restricting the use of processing water will have severe economic impacts, including

the potential for job losses, and should be avoided. The industrial sector should be removed from consideration of any compliance.

- c. It is not clear from the proposed Framework, or previous legislation, of how to treat the commercial and institutional sectors. If these sectors are to be treated as residential, then agencies should not be required to report their use separately.
3. The Water Board should specify the month and year range (e.g., *June 2013 through February 2014*) for comparison purposes to determine if water agencies are meeting required use reductions. The Framework proposes to “determine if urban water suppliers are meeting required use reductions, water production data, as reported by each individual water supplier for the months of June 2015 through February 2016, will be compared to *the same period(s) in 2013.*”
 4. The Water Board should provide considerations or relief from Proposition 218 requirements in the event agencies require emergency rate increases. Reduced water production equates to reduced revenue. Decreases in revenue would have negative impacts on agencies’ abilities to fund operations and maintenance to support water and wastewater systems.
 - a. The City’s ability to raise rates is limited under Proposition 218. Given the Proposition 218 requirements for raising rates, the Water Board should make clear how it is proposing to address lost revenues for water purveyors.
 5. The Water Board should provide guidance regarding water conservation requirements for sectors using private wells. Otherwise, those sectors would have an unfair advantage over those industries that rely on City-water for their water source.

Santa Maria is committed to providing a safe, reliable water supply to its citizens while at the same time continuing to promote conservation efforts that will reduce water consumption. We respectfully request that the Water Board consider the suggestions listed above in the development of any forthcoming regulations involving mandatory water conservation requirements for cities and water providers.

Respectfully submitted,



SHAD S. SPRINGER, P.E., MPA
Director of Utilities