



May 4, 2015

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
Via E-Mail: commentletters@waterboards.ca.gov

Re: **Comment Letter – Emergency Conservation Regulations**

Dear Ms. Townsend,

The City of Sacramento (Sacramento) writes to comment on the proposed Emergency Conservation Regulations. Sacramento provides a potable water supply from surface waters and groundwater. Sacramento serves more than 136,000 customer accounts and approximately 475,000 residents. Sacramento is making, and will continue to make, concerted efforts and significant investment to increase water conservation and reduce water usage in our community. We support the goal of the Governor and your Board to further that conservation.

These comments are in addition to the comments Sacramento has previously filed regarding the proposed regulations. As noted in previous comments, differences such as the significant climatic variation between coastal and inland areas should be taken into account in the design of conservation requirements. The proposed emergency regulations do not do this.

Regarding the recent amendments to the emergency regulations, we offer the following specific comments:

The Fact Sheet issued by the State Water Resources Control Board requests comments on whether the number of tiers should be doubled to use 2% increments instead of 4%. Sacramento supports the establishment of additional tiers in 2% increments. This is a simple way to provide a more accurate correlation between the proposed conservation mandates and the ranking of water suppliers using the Board's R-GPCD methodology, without adding any administrative complexity.

Sacramento also supports the proposed change to Section 864 (a) (8), to prohibit irrigation with potable water of outside landscapes for newly constructed homes and buildings that is inconsistent with regulations or other requirements to be established by the California Building Standards Commission. To implement this component of the Governor's Executive Order, the issuance of such regulations by the Building Standards Commission will provide a more appropriate and effective mechanism for regulating new construction.

Please contact Jim Peifer at (916) 808-1416 if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "William O. Busath".

William O. Busath, PE
Director of Utilities

City of Sacramento Department of Utilities
916-808-1400
1395 35th Avenue
Sacramento, CA 95822