



May 16, 2016

Delivered via e-mail to: commentletters@waterboards.ca.gov

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

Subject: May 18, 2016 BOARD MEETING (Conservation Extended Emergency Regulation)

Dear Chair Marcus and Members of the Board:

Thank you for the opportunity to provide comments on the State Water Resources Control Board (State Water Board) proposed Conservation Extended Emergency Regulation (Emergency Regulation). The City of Santa Rosa is a retail water supplier serving approximately 173,000 residents in Sonoma County and receives its water supply from the Sonoma County Water Agency. The City is a member of the Water Advisory Committee (WAC) to the Sonoma County Water Agency, which consists of the cities of Santa Rosa, Rohnert Park, Sonoma, Cotati, Petaluma, Town of Windsor, North Marin, and Valley of the Moon Water Districts (Water Contractors). Water supply for the Sonoma County Water Agency is derived from local surface water reservoirs – Lake Sonoma and Lake Mendocino. These local reservoirs are full and, per State Water Board D1610, water supply conditions are normal on the Russian River. Due to our local reservoirs and above average rainfall, our region is not currently experiencing a drought emergency. In recognition of these conditions, the WAC adopted a Resolution on April 4, 2016, requesting the State Water Board rescind the application of the Emergency Regulation to the retail water agencies in Sonoma and Marin counties.

Santa Rosa has a long-standing commitment to water use efficiency, recognizing the vital role that water conservation provides in maintaining a reliable water supply. Due to Santa Rosa's water conservation efforts, since 1996 our total annual gallons per capita per day (gpcd), which includes water use for residential, commercial, industrial, institutional, irrigation as well as unaccounted for water, has been reduced by 47% from 162 gpcd in 1996 to 86 gpcd in 2015. The City has also been proactive in our response to previous water shortages through implementation of our Urban Water Shortage Contingency Plan, exceeding requested reductions in water supply from our customers, and preserving water supply to meet all needs. In response to the current Emergency Regulation, the City was assigned a 16% conservation standard and through April 2016, we have reduced our water use by 25% compared to the 2013 baseline.

Santa Rosa appreciates the changes that have been proposed to the Emergency Regulation, taking into account local supply reliability and allowing for water agencies to self-certify their water supply availability. Upon review of the proposed Emergency Regulation, we recommend the following modifications:

1. Sec. 864.5(b) – Allow the conservation standard to be calculated based on the first year instead of the third year to reflect current conditions.
2. Sec. 864.5(b)(2) – Include 2015 in the potable water demand calculation, providing for an average of three years. This will better reflect current water usage, including long-term, sustainable conservation measures that have been implemented in 2015.

In addition, in the May 10, 2016 message from the State Water Board, a question was included regarding whether there should be a conservation floor (e.g., a minimum conservation level). Santa Rosa does not support a conservation floor and encourages the State Water Board to rely on the self-certification analysis to determine the level of conservation needed based on local supply availability and reliability.

Thank you for the opportunity to provide input on the potential adjustments to the Emergency Regulation. We look forward to continuing to work with the State Water Board, the Department of Water Resources, and the Brown Administration on future long-term water conservation efforts. Should you have any questions on these comments, please feel free to contact Jennifer Burke, Deputy Director Water and Engineering Resources at 707-543-3359 or via email at jburke@srcity.org.

Sincerely,



Linda Reed
Interim Director – Santa Rosa Water