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May 16, 2016

(5/18/16) Board Meeting- Item 10
Conservation Extended Emergency Reg
Deadline: 5/16/16 by 12:00 noon

The Honorable Felicia Marcus, Chair
And Honorable 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 Regulations)"

Dear Chair Marcus and Members of the Board:

Sacramento Suburban Water District (SSWD) appreciates the opportunity to comment on the subject Emergency Regulations. SSWD serves public drinking water to roughly 175,000 people in north Sacramento County. Our District invested heavily in a drought resilient, fully conjunctive use water supply. Through these investments, we can reliably meet all customer demands for multiple extremely dry years while sustainably managing groundwater supplies. Over the past 15 years, we have banked roughly six years' worth of total water supply above and beyond our commitment to sustainably manage the local groundwater basin.

SSWD supports the staff proposal to allow purveyors to account for individual supply situations through a self-certification process. We further support the Association of California Water Agencies' (ACWA) recommended modifications outlined on page 2 of their May 13, 2016 comment letter.

SSWD firmly opposes any suggestions that there should be a minimum "conservation floor" as it would continue to undermine the significant investments SSWD has made in drought resilient and sustainable water supplies. Our customers should be able to use the investments they have made to carry them through these extremely dry years. In addition, our District stands ready to transfer available water supplies to areas of the state in greater need, but is presently precluded from helping due to conveyance limitations.



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In conclusion, we support SWRCB’s adoption of the modified emergency regulations, with amendments proposed by ACWA, and without an artificial minimum conservation floor that would disincentivize others from making similar investments in drought resilient water supplies.

We look forward to working with staff at the Department of Water Resources and the SWRCB as we pivot from emergency regulations to long-term improvements in water use efficiency.

Please do not hesitate to contact me if you have any questions, or would like to discuss our comments in further detail. I can be reached at (916)679-3994 or thru email at roscoe@sswd.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert S. Roscoe". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert S. Roscoe

General Manager

cc: David Bolland, ACWA