



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

May 13, 2016



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

Dear Chair Marcus and Members of the Board:

Thank you for the opportunity to comment on the Emergency Water Conservation Regulations. We appreciate the State Board’s proposal to take water supply into account when considering a revised conservation mandate. We have the following comments on the proposed regulations.

The State Board should not adopt a new minimum conservation standard for urban water suppliers. The 20x2020 regulations have already established a minimum conservation level for water suppliers, and with that in mind SFPUC is opposed to implementing a separate conservation floor. Additionally, the State Board’s methodology already takes into account an additional level of conservation that was reflected in the average 2013-2014 demand. Also, in keeping with historic patterns, in areas where demand has fallen substantially it is likely to stay suppressed for several years even if conservation mandates are fully lifted. The revised regulations allow the State Board to determine whether each agency has sufficient supplies for the next three years, and it would be inappropriate to impose a conservation mandate if it is determined that an agency has sufficient supplies.

We would strongly prefer to calculate our Wholesale supplies in aggregate, rather than by individual retail agency as proposed in the current regulations. Using the State Board’s proposed methodology, we can calculate how much supply is available to the entire Hetch Hetchy Regional Water System assuming hydrology from water years 2013 through 2015, and what the demand over the entire system was for 2013-2014. We did do that analysis using the methodology in the proposed regulations, and determined that the San Francisco Regional Water System would not have a supply shortfall under the State Board’s scenario. Our Wholesale Customers have done an excellent job of conserving over the past few years and we have coordinated well in our service area to ensure everyone has sufficient supplies to meet their needs. We would like the flexibility to continue with that approach.

- Edwin M. Lee**
Mayor
- Francesca Vietor**
President
- Anson Moran**
Vice President
- Ann Moller Caen**
Commissioner
- Vince Courtney**
Commissioner
- Ike Kwon**
Commissioner
- Harlan L. Kelly, Jr.**
General Manager



We understand that the State Board is asking for this analysis with the simple goal of determining whether each supplier has three years' worth of supply in order to decide how to adjust each agency's conservation mandate. For long term supply planning, we support the State Board looking to water agencies as capable of doing our jobs to safeguard supplies for our customers. SFPUC performs robust supply planning to prepare for drought, including an 8.5 year design drought. We plan to work collaboratively with the state on broader water supply planning initiatives, per the Governor's most recent Executive Order.

Lastly, it is not clear why the State Board is proposing to drop the hospitality industry water use prohibitions. We recommend the State Board maintain those prohibitions or provide a compelling reason to rescind them when the other prohibitions remain in place.

We look forward to working with you to implement the updated conservation regulations.

Sincerely,

A handwritten signature in blue ink, appearing to read 'SR Ritchie', is written over a faint, illegible typed name.

Steven R. Ritchie
Assistant General Manager, Water

Cc: Nicole Sandkulla, BAWSCA