



April 11, 2016

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

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – Urban Water Conservation Workshop

Thank you for the opportunity to comment on the State Water Resources Control Board (State Water Board) proposed modification of the Emergency Regulation for Statewide Urban Water Conservation (Executive Order B-36-15). The City of Brentwood appreciates staff's willingness to consider input from water agencies and consider additional modifications.

The State Water Board's acknowledgement in the Proposed Extended Regulation of the importance of climate and growth adjustments to address acute equity issues associated with the existing Emergency Regulation and the importance of providing credits for drought-resilient supplies were key changes that needed to be made.

However the City's investments in local drought-resilient water supplies such as non-potable recycled water supply and fill station projects and irrigation conversion projects that have allowed the City to meet the required 32 percent conservation standard were not given any consideration or credit.

Brentwood has achieved a cumulative conservation rate of 39.6 percent as of March 2016, but not without considerable impact on our customers and the City's Water Enterprise.

Unlike many water suppliers in the State, Brentwood's has taken great efforts to meet and exceed the City's 32 percent conservation standard and reducing it to 28 percent is a step in the right direction, however additional adjustments are needed for Brentwood.

Shasta Reservoir, Lake Oroville and Folsom Lake filled above historical average for this time of year and will continue to fill as snow in the sierra melts. It is not practical to continue to require the residents of Brentwood to cut back by 28 percent when the flood gates are opened to control the upper reservoirs that supply Brentwood's source water.

Thank you for considering the City of Brentwood's comments. If you have any questions, please contact Chris Ehlers, Interim Director of Public Works/Operations at (925) 516-6000.