



San Francisco
Water Power Sewer
Operator of the Hetch Hetchy Regional Water System

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July 10, 2014

Via Electronic and U.S. Mail

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
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Sacramento, CA 95814-0100
commentletters@waterboards.ca.gov

Dear Ms. Townsend:

The San Francisco Public Utilities Commission (SFPUC), operator of the Hetch Hetchy Regional Water System, submits the following comments on Agenda Item 10 on the State Water Resource Control Board's July 15-16, 2014 Agenda, regarding "Consideration of a proposed Resolution for drought-related Emergency Regulations pertaining to urban water conservation".

Our Regional Water System (RWS) provides water for municipal and domestic uses to 2.6 million water users in Tuolumne, Alameda, Santa Clara, San Mateo, and San Francisco counties. We serve 26 wholesale water customers outside San Francisco, in addition to other customers outside the city like the Groveland Community Services District in Tuolumne County. We are the third largest supplier of water for domestic and municipal purposes in California.

We provide water from the Tuolumne River, Alameda Creek, San Mateo Creek and Pilarcitos Creek watersheds. On average, 85 percent of our RWS supplies come from the Tuolumne River watershed. In addition to these supplies, San Francisco and its customers have developed groundwater, recycled water and other non-potable sources of supplies. The SFPUC and its customers have also been implementing water conservation for decades and as a result have reduced their water demand by 17% since FY 02-03 while population in our service area has increased by 4%. Residential per capita water use in the City of San Francisco is about 49 gallons per capita per day (gpcd). Gross per capita water use is approximately 88 gpcd.

San Francisco's low per capita water use is a reflection of San Francisco's achievements in water conservation, as well as its urban environment. We support the State Water Board's efforts to reduce urban water use, particularly domestic outdoor water use. The "Prohibited Activities in Promotion of Water Conservation" are largely already covered by our existing rules and regulations. We will increase our efforts to enforce them. At the same time, dense urban communities like San Francisco do not have significant domestic irrigation

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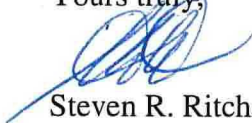


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needs. In fact two of our largest outdoor irrigation users, Harding Park Golf Course and Golden Gate Park are irrigated with recycled water and non-potable groundwater¹, respectively. Thus, applying mandatory restrictions on outdoor water use are important for California but won't necessarily result in significant additional water savings in San Francisco. For example, in a San Francisco household that may use 150 gallons of water per day only 20% (or 30 gallons per day) are used for outdoor use. If that customer is required to reduce its outdoor use by 10% it will merely reduce the total household's use by 3 gallons or 2%. We encourage the State Water Board to keep these factors in mind as it reviews the monthly monitoring reports provided by urban water suppliers and evaluates the results of the water use restrictions.

We appreciate the opportunity to provide these comments and sincerely thank the State Water Board for its efforts.

Yours truly,



Steven R. Ritchie
Assistant General Manager, Water

cc: Bay Area Water Supply and Conservation Agency
California Urban Water Agencies

¹ Our Westside Recycled Water Project will provide delivery of recycled water to Golden Gate Park for irrigation, allowing us to convert the Park wells to potable use as part of the recently-approved San Francisco Groundwater Project.