



**Environmental Utilities
Administration**
2005 Hilltop Circle
Roseville, California 95747

(3/17-18/15) Board Meeting- Item 7
Urban Water Emergency Regs
Deadline: 3/16/15 by 12:00 noon

March 11, 2015



Delivered by 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: Resolution amending drought-related emergency regulations for urban water conservation

Dear Chair Marcus and Members of the Board:

The City of Roseville (Roseville) is well aware of the continued drought conditions throughout California and appreciates the efforts the Board has made to achieve statewide water conservation results. Roseville water users have responded to the call to reduce their water use by achieving a 19.4% reduction in 2014. Roseville is on track in 2015 to continue that savings trend.

Roseville appreciates this opportunity to comment on the proposed text of emergency regulations that will be heard at the March 17th Board meeting. We have three specific recommendations:

1. Extend the Urban Water Supplier Implementation Period from 30 to 60 Days

As written, urban water suppliers that do not have a water shortage contingency plan that restricts the number of days that outdoor irrigation of ornamental landscapes and turf with potable water is allowed, or has been notified by the Department of Water Resources that its water shortage contingency plan does not meet the requirements of Water Code section 10632 shall, within thirty (30) days, limit outdoor irrigation of ornamental landscapes or turf with potable water by the persons it serves to no more than two days per week. Roseville emphatically requests that the implementation period be extended from 30 days to 60 days. Roseville's water shortage contingency plan is implemented by City Ordinance. Accordingly, the process of creating/modifying/editing an Ordinance to approval is lengthy, consisting of initial departmental review, City manager review, City Attorney review, publication of public hearing notice and then presentation to the City Council. To allow for various departmental comments, a 60 day timeframe is strongly urged.

2. Provide Clarity on Process to Amend Water Shortage Contingency Plan

Roseville would like to request clarification that modification to an agency's water shortage contingency plan can be done through a resolution or ordinance change. Many agencies have a copy of their contingency plans in their Urban Water Management Plans and the working copy of the contingency plan in resolution or ordinance form. Roseville would like assurance that our plan can be amended through an ordinance change and not through a separate addendum to our Urban Water Management Plan.

3. Increase Public Awareness

Though not directly related to the Board's proposed regulatory action, Roseville would like to reiterate the importance of continued public awareness. We do the best we can with the limited resources we have. To further our message, we would greatly appreciate increased funding towards the Save Our Water program. In addition, we appreciate the Governor's personal efforts to remind Californians that we are in a drought and to continue to conserve water. We have noticed a drop in water use and overall water demand when the Governor speaks on this topic. We encourage the Water Board to work closely with the Governor's office to expand opportunities for strategic messaging on the importance of conserving water this summer.

Thank you for your consideration of these comments. If you have any questions, please contact Lisa Brown at lbrown@roseville.ca.us or (916) 746-1710.

Sincerely,



Richard D. Plecker
Director of Environmental Utilities