



April 13, 2015

Ms. Jessica Bean
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento CA 95814

EMAIL: Jessica.Bean@waterboards.ca.gov

Subject: Comments on Mandatory Conservation Proposed Regulatory Framework Released on April 7, 2015

Dear Ms. Bean,

Sacramento Suburban Water District (SSWD) serves a population of roughly 173,000 people in northern Sacramento County. Our water supply is a fully conjunctive water use system utilizing groundwater in dry times supplemented with surface water in wet times when available to sustainably manage our groundwater resources. We are committed to doing our part to ensure the Governor's drought emergency declarations are met. SSWD appreciates the opportunity to comment on the subject proposed regulatory framework. We appreciate the magnitude of challenges the current drought has caused for California.

First, we wish to state that we are in concurrence with the comments presented by Executive Director John Woodling of the Regional Water Authority in their comment letter of this same date. Their comments may be viewed as ours in addition to those presented below.

While it is likely impossible to impose such onerous conditions on a mandatory basis to the approval of all in the statewide water community, we believe adherence to certain principles should guide your regulatory approach. The basic reason we are facing such onerous water restrictions is because the present drought has provided insufficient water for both human needs and the needs of our environment. The first principal is that restrictions on urban water users should be based on the net amount of water removed from our natural environment. A second principal should be achieving a regulatory framework that is equitable, achieves buy-in from the elected officials who must adopt implementing rules, and is defensible to the public statewide. A third principal should be inclusion of the water-energy nexus and AB 32 greenhouse gas emissions.

Regarding the net water take from the environment, we believe flows returned to the watershed should be credited. If Residential GPCD becomes the metric, that metric is volume-only based. Roughly 40% of the total Sacramento-area water demand is returned to the Sacramento River upstream of the delta, and available for subsequent diversion and reuse downstream. These return flows assist in meeting delta outflow requirements allowing lower releases from upstream reservoirs, conserving precious supplies for both human and environmental needs. In the



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specific case of SSWD, as our conjunctive use plans have allowed banking of over 180,000 acre-feet of water over the past 15 years, we have been able to reliably serve 100% groundwater throughout this drought. As we are serving 100% groundwater from a sustainably managed basin, 40% of all water we pump ends up supplementing flows in the Sacramento River upstream of the delta. SSWD is contributing flows to surface water where it is most needed.

On the same principle of accounting for net water removed from the environment, transmission losses should also be included in the accounting. Distribution system losses are important to include in water conservation, but somehow transmission losses are presently ignored. If a smaller amount of water is delivered to a water purveyor's distribution system than was removed from natural systems because of leaking transmission facilities, that loss should be included in the calculation of R-GPCD.

On the second principle of achieving an equitable framework, SSWD again concurs with the statements and options presented in the RWA comment letter. The "brackets" create a situation where a purveyor with a 1% higher R-GPCD number than their neighbor may be required to achieve a 10% higher conservation target. This inequity creates a problem in explaining the fairness of the system to the public, and can easily be resolved through a "smoothing" of the brackets with much smaller steps between the brackets, or simply adopting a straight line function instead of the step function. We understand that this is essentially a "zero sum game," but there will be a much wider acceptance of the approach if it is viewed as equitable. In addition, regional conservation messaging will be much more effective if similar message points apply to all purveyors in a region.

On the third principle, the SWRCB should not completely ignore AB32 and the clear nexus between water use and energy use. This is certainly not equal between purveyors across the state, as some water supplies generate hydroelectricity (though significantly less during this drought), and some require massive amounts of energy to deliver distant supplies to service areas. Neither are all sources of energy equal, so the greenhouse gas footprint for each water source should be considered. We should invest our conservation efforts where we get the "most pop for the drop" to quote SWRCB Chair Marcus. That can only happen when the energy component of water supply is also considered.

Thank you for the opportunity to comment. Please contact me at (916) 679-3994 or at roscoe@sswd.org should you have any questions.

Sincerely,



Robert S. Roscoe, PE

General Manager

Sacramento Suburban Water District