



City of Davis Public Works Department
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January 21, 2016

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

Subject: Comment Letter – 2/2/16 BOARD MEETING (Conservation Extended Emergency Regulation)

Dear Ms. Jeanine Townsend:

City of Davis staff appreciate the opportunity to provide input on the proposed adjustments to the conservation standards in the Emergency Regulation for Statewide Urban Water Conservation. We commend State Water Board staff for taking stakeholders' concerns into account and proposing adjustments to the required water reductions. In particular, we support the proposed climate adjustment to account for differing plant water needs in warmer areas of the state.

City staff propose one modification to the climate adjustment. With the total allowed adjustment to the conservation standard now being 8% instead of 4%, we propose modifying the ETo deviations to range from 2 to 5% instead of 2 to 4%. The 3% reduction in conservation standard is for a broad range of deviations from the statewide average Eto. We propose breaking the 10 to 20% deviation into 10 to 15% (with a 3% reduction in the conservation standard) and 15 to 20% (with a 4% reduction in the conservation standard). This would include modifying the >20% deviation to be a 5% reduction in the conservation standard (as shown in the table below).

Deviation of Urban Water Supplier Service Area's ETo from the Statewide Average ETo	Reduction in Conservation Standard
>20%	5%
15 to 20%	4%
10 to <15%	3%
5 to <10%	2%

Please contact us with any questions regarding our written comments.

Sincerely,

Stan Gryczko
Assistant Public Works Director/Operations