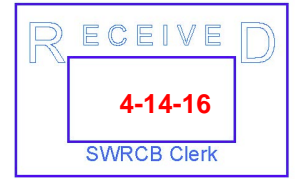




(4/20/16) Public Workshop
Urban Water Conservation
Deadline: 4/14/16 by 12 noon

April 14, 2016

State Water Resources Control Board
Attention: Jeanine Townsend, Clerk to the Board
1001 I Street
Sacramento, CA 95814



SUBJECT: COMMENTS FOR APRIL 20, 2016 WATER CONSERVATION WORKSHOP

Honorable Board Members:

We appreciate the opportunity to provide input to the State Water Resources Control Board ("State Board") on the potential modification of the current Emergency Regulation for Statewide Urban Water Conservation. After reviewing the New Urban Water Conservation Standards effective March 1, 2016, we offer the following comments in response to Question 1 posed in the Notice of Public Workshop for Wednesday, April 20, 2016.

1) What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?

Water suppliers throughout California have raised the issue of equity since the Emergency Drought Regulations came into effect. Issues such as considerations for differences in climate, growth, and investments in drought resilient supplies have been raised at various forums and have been conveyed to the State Board. The Emergency Drought Regulations adopted by the State Board on February 2, 2016 incorporated stakeholder feedback on the issue of credits and adjustments and while not without flaws, was viewed positively by water agencies. This is why we are very disappointed that so many requests for a climate credit adjustment in our arid region were denied simply because the California Department of Water Resources has not installed a California Irrigation Management and Information System (CIMIS) station in each of our service areas. We do not believe that a CIMIS station is required in every water supplier's service area throughout the State. We believe that reasonable flexibility must be built into any changes to the current regulation.

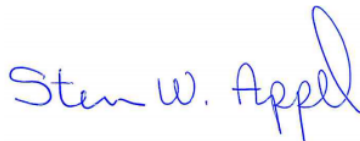
We noted the State Board has denied 76 percent of the total number of climate credit adjustment requests received. Upon further review, we noted that 84 percent of these requests were denied on the grounds that there was no CIMIS station within the urban water suppliers' service area. The staggering number of denials highlights the failure of the current methodology used by the State Board for approving climate credit requests and the need for flexibility in the use of CIMIS data for in-lieu climate adjustments.

We urge the State Board allow for flexibility when considering in-lieu climate adjustments and request the State Board to consider the following:

Climate Adjustment:

- For urban water suppliers that do not have a CIMIS station within their service area, allow the supplier to:
 - Use a CIMIS or comparable station within a 25 mile radius of the supplier's service area as long as the CIMIS Station is in the same reference evapotranspiration (ETo) zone
 - Interpolate ETo for the suppliers' service area using defensible, scientific spatial interpolation techniques such as Proximity Polygons, Inverse Distance Weighted, Kriging etc.

In summary, we believe, should further extension of the Emergency Regulation be warranted by both hydrology and regional supply availability, considering these comments will contribute to the equity of the credits and adjustments incorporated into future urban water suppliers' conservation standards. We look forward to working with the State Board to develop and implement an equitable and appropriate Emergency Regulation Climate Adjustment moving forward.



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