



CITY OF CLOVIS

CITY HALL · 1033 FIFTH STREET · CLOVIS, CA 93612

April 9, 2015

Jessica Bean
State Water Resources Control Board
Sent via email

Thank you for the opportunity to comment on the State Water Resources Control Board's Proposed Regulatory Framework for Mandatory Conservation. The City of Clovis' comments are as follows:

1. The City of Clovis has made significant capital investments in order to responsibly manage our available water sources in a sustainable and resilient manner. These improvements include a surface water treatment plant, a water recycling plant to use treated wastewater for irrigation, a groundwater recharge facility, and most pertinent to the current discussion, water banking facilities to provide a source of water during droughts. The City's has invested approximately \$10 million in the banking facilities alone. These types of investments are exactly the type of long-term solutions to California's water problems that are needed state-wide. Arguably, if all of California had made equivalent investments, the current drought would be much less of a crisis.

Along with implementing numerous water-conserving measures, Clovis intends to withdraw a few thousand acre-feet of water from our banking facilities during the current year to compensate for our greatly reduced surface water allotment (approximately 27% of normal). The use of this banked water will reduce the need for Clovis to pump ground during this drought. However, the Proposed Regulatory Framework does not recognize the use of this water, which was banked expressly for this purpose, as a conservation measure. Instead, this water is treated just like our normal sources of water and subject to the same mandatory reductions.

Clovis respectfully suggests that the consumption of any water that was banked expressly for drought resilience be excluded from the urban water usage figures that will be used to determine compliance with the mandatory reductions. If this banked water is treated the same as normal sources, then it results in a financial disincentive for communities to invest in these kinds of

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long-term solutions. Conversely, if the banked water is considered as a conservation measure and excluded from these figures, it sends a strong message supporting investment in measures that could make the next drought much less of a crisis.

2. Clovis understands that outdoor landscaping represents a large demand on the state's urban water supplies, and that this demand needs to be reduced. However, the proposed use-reduction tiers are based solely on per-capita use without any consideration of climatological factors. We recognize that pre-existing water conservation efforts should be considered when setting goals for reduction, but the climatological effects on water consumption are also well understood. It is striking that an overwhelming majority of the communities assigned to Tier 4, which require a 35% reduction, are inland communities in hot, dry climates, and that an equal majority of the communities in Tier 1, that only require a 10% reduction, are coastal communities. By assigning tiers without regard to climatological factors the State is burdening the residents of inland communities with an unfair portion of the overall reduction in water use.

Clovis respectfully suggests that there should be some consideration given to climatological factors when setting reduction requirements, and/or the mandatory reductions for the various tiers be more equal, so as not to unduly burden a certain minority of the population because of where they happen to reside.

Again, thank you for the opportunity to comment on the Proposed Regulatory Framework for Mandatory Conservation. We look forward to working with your agency and others to sustainably and resiliently manage California's water resources through this drought and into the future. Please call me at (559) 324-2614 if you have any questions.

Luke Serpa
Public Utilities Director.