



City of Davis Public Works Department
1717 Fifth Street Davis, CA 95616
530-757-5686

(12/7/15) Public Workshop
Urban Water Conservation
Deadline: 12/2/15 by 12:00 noon



November 30, 2015

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

Subject: Comment Letter – Urban Water Conservation Workshop

Dear Ms. Jeanine Townsend:

City of Davis staff appreciate the opportunity to provide input on potential modifications to the Emergency Regulation for Statewide Urban Water Conservation. We understand that the emergency regulation may be extended until October 31, 2016 in response to the ongoing drought depending upon the amount of precipitation the State receives during the upcoming winter months. We feel that some modifications to the emergency regulation are appropriate if it is extended.

City staff feel that the current emergency regulation should be modified to take climate, current weather conditions, the economy, and landscape water demands into account. In Davis and other areas that experience high temperatures during the summer months, water use in the winter months may be less than half of summertime use. Lower historic water usage in the winter months should be taken into account when calculating the baseline for 2013 water usage. Using the r-gpcd for July - September as a baseline only encompasses higher summer use and doesn't take into account lower usage in the fall and winter. Even with drought-tolerant landscaping, water needs and evapotranspiration rates in the Sacramento area will be higher than those in cooler climates. Evapotranspiration or some other measurement of plant water needs as they vary by climate should be taken into account when calculating required water reductions. Alternatively, grouping areas and setting targets by hydrologic region, as is done in SBx7-7, would accommodate different climate patterns throughout the state.

The current precipitation patterns and the possibility of El Niño rains may lead to lower water use reductions due to the perception that the drought is not as severe as in prior years. Although the City plans continued messaging to reinforce the drought conditions and the need to continue conservation efforts, many people are already experiencing message fatigue. Taking this into account when modifying water use reduction targets will allow cities, like Davis, to focus on long-term sustainable changes in water use instead of shorter term drought related efforts.

With the slower economy in 2013, construction water use and new development was at a low point. Construction water and new development has increased significantly in Davis in 2015 and should be accounted for in the water use reduction requirements. As the economy continues to

grow, additional construction will be occurring throughout the state and may increase water use in areas even with active conservation programs in place.

Many residents and businesses in Davis and other areas throughout the state have let their lawns go “golden” and are now converting to water-wise landscapes. Water-wise landscapes have many benefits in the long term but do need water to become established and will require supplemental water in the summer (in warmer climates) for the first few years. Water agencies that had a significant number of turf conversions may see an increase in water use to meet plant establishment needs as compared to when the turf was being allowed to die off. It will also become more difficult over time to sustain water savings with demand hardening and with many of the more easily achieved actions already taken. Future actions to receive a small amount of water savings may become cost prohibitive.

City staff are in support of the Regional Water Authority’s request for the addition of a regional compliance option. A regional compliance option would encourage water agencies to work collectively toward meeting a regional goal. A regional conservation target would allow water agencies to leverage resources for joint conservation programs and increase the cost effectiveness of those programs.

Please contact us with any questions regarding our written comments.

Sincerely,



Dirk Brazil
City Manager