



CITY OF CLOVIS
PUBLIC UTILITIES DEPARTMENT
155 N. SUNNYSIDE AVENUE
CLOVIS, CA 93611



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

The City of Clovis respectfully submits the following comments for consideration for the Urban Water Conservation Workshop:

1. The method used to assign cities to the different mandatory conservation tiers is inconsistent with the Executive Order B-29-2015. The executive order calls for a 25% reduction in total urban water usage and requires that areas with higher per capita use achieve proportionally higher reductions. Nowhere does the order indicate that the proportionality shall be based on residential per capita use. Yet cities were assigned to the tiers based solely on the residential per capita use without considering total per capita use, and the SWRCB reports residential per capita usage (R-GPCD) on its Conservation Reporting webpage rather than total per capita usage. As a result, Clovis, which has a higher R_GPCD than some surrounding cities is in a higher conservation tier than those cities, even though Clovis' total per capita usage is less than those cities'. Since the executive order addresses total water consumption, total per capita usage should be used to assign cities to the different mandatory conservation tiers, not residential per capita usage, and SWRCB should be reporting total per capita usage on its webpage.
2. The method used to assign cities to different mandatory conservation tiers ignores the very significant measures that cities such as Clovis have taken to reduce non-residential water use. The City of Clovis invested \$30 million in a treatment plant to recycle the city's waste water, and another \$30 million in a distribution system to deliver that recycled water to areas within the city. The recycled water is used to irrigate the city's parks, trails, medians, and street-side landscaping. The water is also used by CalTrans to irrigate the landscaping along Freeway 168, and by Clovis Community Medical Center to irrigate their

campus. This use of recycled water for irrigation directly offsets the use of potable water, and this type of investment is exactly the kind of long-term water conservation measure that the state should be supporting. However, since the recycled water is not used for residential irrigation, the resulting conservation was not considered when Clovis was assigned to the highest conservation tier. As indicated in comment #1 above, the total per capita usage should be used to assign suppliers to the different tiers, not just residential per capita usage.

3. The use of the R-GCPD just during the months of June through September is yet another inconsistency in the method of assign cities to tiers. This inconsistency places an unfair burden on the hotter, inland areas of the state. A 36% reduction in water usage is feasible during the summer months in the hotter inland areas; a 36% reduction in usage is not feasible during the winter months. The original executive order covered the period of June through February, and Executive Order B-36-15 will likely extend the compliance period to October. Tier assignments should be based on the per capita usage for the entire compliance period, or the conservation mandates for the different tiers should be seasonally adjusted based on climatological factors.
4. The mandate for a reduction in total water usage rather than per capita water usage unfairly burdens growing cities such as Clovis. Clovis, which grew by more than 4% between 2013 and 2015, is growing faster than the state is growing. Much of Clovis' growth is a result of people moving to Clovis from other cities within California. This type of internal movement makes it easier for some cities to reduce total usage, but harder for growing cities such as Clovis. Forcing growing cities to continue to reduce total water consumption rather than per capita water consumption could eventually lead to building moratoriums which will have major economic and social impacts. The conservation mandates should be based on per capita usage, not total usage. In order to achieve the Governor's ordered 25% reduction in total usage, the statewide per capita conservation mandate could be calculated by adjusting the 25% figure for the statewide annual population growth during the compliance period (approximately 0.9%).
5. Any water that is utilized from local storage facilities that were expressly created to provide a source of water during droughts should not be counted as usage in determining compliance with the mandates. Clovis has invested approximately \$10 million in water banking facilities in the last 10 years to ensure a reliable and resilient source of water for the City's customers. This represents more than \$100 per resident, which is more on a per capita basis than the State's Proposition 1 Water Bond will be spending on new storage. This type of investment is 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 less of a crisis. 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 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.

Thank you for the opportunity to provide comments for the Urban Water Conservation Workshop. 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