



City of Corona  
Department of Water and Power  
*"Protecting Public Health"*

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January 5, 2016

Kathy Frevert  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 92815-0100

Subject: Comments on Proposed Regulatory Framework

Dear Ms. Frevert:

The City of Corona appreciates the opportunity to comment on the Proposed Regulatory Framework for Extended Emergency Regulations for Urban Water Conservation as released on December 21, 2015. We understand that the State of California faces many challenges, and we support the Governor's continued commitment and the efforts by the State Water Resources Control Board to address these challenges as the drought continues.

### **Climate Adjustment**

The City of Corona supports staff recommendations to incorporate a climate adjustment in the Emergency Regulations that would reduce the conservation requirement by up to 4 percentage points for water suppliers located in the warmest regions of the state. However, the City of Corona recommends modifying the months selected for calculating average ETo from July through September to June through August. Evaluating the California Irrigation Management Information System (CIMIS) data from active weather stations throughout California, it is clear that ETo values are higher in the month of June than in September. This trend occurs in Sacramento County, Los Angeles County, the San Joaquin Valley, San Bernardino County, Ventura County, Marin County, Riverside County, among others. The same trend is shown throughout the coastal regions of the state based on active CIMIS weather station data from June through September 2015. This trend exists in previous years including La Nina years. Therefore, The City of Corona recommends staff adjust the months for ETo comparison to June through August to best reflect the peak temperature and low rainfall periods reflected throughout the state.

### **Growth Adjustment**

The City of Corona supports the staff recommendation to provide a mechanism to adjust water supplier conservation standards to account for water efficient growth since 2013.

### **Drought Resilient Water Supplies**

The City of Corona also supports the staff recommendation to provide a one-tier reduction to the conservation standard of urban water suppliers using new drought resilient water supplies.

### **Non-Potable Recycled Water Use Credit**

The City of Corona strongly disagrees with the staff's recommendation to not provide additional credit for non-potable recycled water. Like indirect potable reuse, recycled water provides a valuable long-term drought resilient water supply for irrigation, as well as for process operations in the commercial, industrial and institutional sectors. Furthermore, recycled water contributes to a growing water supply for landscape maintenance districts (LMDs), multi-family residential landscapes and homeowner's associations (HOAs). This is directly impacting the perception of recycled water use within the community and helping to transform residential support of the "new norm" in California water usage.

In the City of Corona, 213 customers including institutional facilities, businesses, LMDs and HOA landscape areas were converted to recycled water prior to 2013. This resulted in an estimated 14,462 acre feet savings with over 19 million square feet of landscape irrigated with recycled water. As a result of these proactive efforts, we have fewer CII, LMD and HOA customers to target in reducing potable water usage to achieve our water conservation reduction standard. In essence we have hardened our demand by converting these customers to recycled water as they are some of the largest users in our service area.

Since 2013 the City of Corona has significantly expanded the recycled water system and connected additional customers to recycled water services. Since 2013, an additional 63 customers now receive recycled water and 40 additional sites are currently in the process of converting for a total of 316 sites utilizing recycled water throughout the city. The City of Corona has saved an estimated 512 AF of potable water since 2013 from sites converted to recycled water and over 36 million square feet of landscape is now irrigated with recycled water. From 2013 to 2015, the percentage of total water supply from recycled water increased from 9.4% to over 12%.

*Table: City of Corona Recycled Water Supply as a Percentage of Total Water Supply*

<b>Year</b>	<b>Potable Supply AF</b>	<b>Recycled Supply AF</b>	<b>Total Supply</b>	<b>% Supply from Recycled Water</b>
<b>2013</b>	34,496.31	3,594.77	38,091.08	9%
<b>2014</b>	34,544.30	4,247.07	38,791.37	11%
<b>Jan-Nov 2015</b>	27,303.40	3,748.63	31,052.03	12%

The City of Corona asks the Board to consider providing a proportional adjustment credit for recycled water based on the percentage of total water supply from recycled water, up to 4 percentage points. The table below provides an example of how the percent reduction could be determined based on percentage of water supply from recycled water.

*Example Recycled Water Credit Standard*

<b>Percent of Water Supply from Recycled Water</b>	<b>Percent Reduction in Conservation Standard</b>
>30%	4%
20-30%	3%
10-20%	2%

The percent of water supply from recycled water would be calculated based on the following:

$$\text{Percent of Water Supply from Recycled Water} = \frac{(\text{Recycled Water Supply} * 100)}{(\text{Potable} + \text{Recycled Water Supply})}$$

The percent reduction in the conservation standard would adjust for every 10% of the water supplier's total water supply that is from recycled water. Based on these conditions, the City of Corona would only receive a 2% reduction in its conservation standard.

An adjustment for recycled water supply encourages water suppliers to invest in their recycled water system and provides an important immediate incentive to quickly convert customers to recycled water service. This will result in immediate savings and a long-term drought resilient water supply.

**Groundwater Credits**

The City of Corona strongly disagrees with staff's recommendation to not provide credits for groundwater use or management. The City of Corona believes that if a water supplier has a long history of sustainable basin management with a groundwater management and sustainability plan, and is not using import water for recharge that a credit should apply.

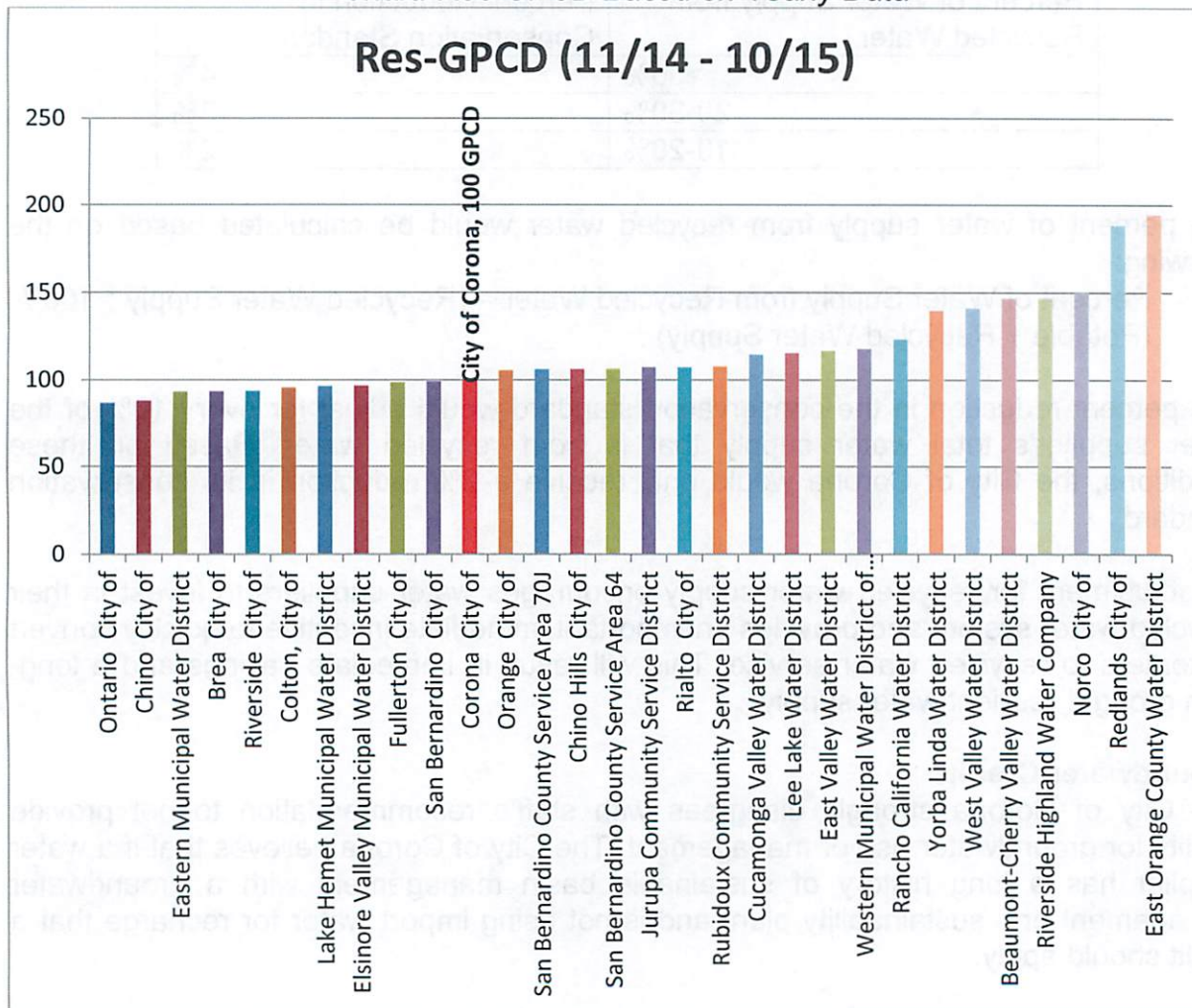


**Year Round Residential GPCD Calculation**

Although we understand staff’s reservations about modifying the R-GPCD calculation based on transient populations, we believe this issue is still important and needs to be revisited even for water agencies that do not have transient populations. The City recommends evaluating a water suppliers’ year round residential per capita water use as it compares to other local agencies’ year-round R-GPCD when considering fines. For example, if a water agency has not met their water conservation standard but they have a lower per capita water usage than most agencies in their region then fines should be not be applied.

The chart below compares the annual residential gallons per capita per day (res-GPCD) for the City of Corona and surrounding water suppliers in the region based on November 2014 through October 2015. The City of Corona’s res-GPCD is lower than 66% of the water suppliers and 16 GPCD less than the average. These water suppliers share similar climate, demographics, and topography with the City of Corona however their res-GPCD is higher.

*Chart: Res-GPCD Based on Yearly Data*



The City of Corona requests consideration of customers' efforts in conserving when determining if fines are recommended for non-compliance. The City of Corona's total water production has decreased by 22%, however residential water usage decreased by 24% and landscape irrigation usage has decreased accumulatively by 35% from June through November 2015. The significant decrease in landscape irrigation usage was mainly due to the City decreasing or eliminating irrigation at non-essential sites, as well as the conversion of several schools, businesses and City properties to recycled water for irrigation.

*Table: City of Corona Water Reduction June – November 2015*

Customer Type	Accumulative Water Reduction June – Nov 2015	Percent Reduction in Customer Usage to Reach 28% Reduction in Water Production
Residential	24%	30%
Commercial / Institutional	22%	
Industrial	26%	
Landscape	35%	
Overall Customer Reduction	25%	
Water Production	22%	28%

The City of Corona has shown dramatic water use reductions across all customer types with the biggest reductions from residential, industrial, and landscape customers. Currently, water suppliers' compliance with their conservation standard is based on total production. This includes water loss, unmetered fire use, and construction; all which are difficult to reduce or cannot be impacted as the water usage for such activities is under strict regulation. As a result, our customers must reduce their water usage at a higher percentage than the water supplier's conservation standard in order for the standard to be met. In the City of Corona, customers would need to reduce by 30% in order for the 28% water reduction standard to be met.

**Cap on Credit and Adjustments**

The City of Corona appreciates the SWRCB efforts to make regulations more fair and equitable to water suppliers throughout the state while setting a framework that maintains the water conservation standards for the State. The City of Corona, like other water suppliers, is eligible for multiple categories of adjustments for our proactive efforts and for uncontrolled circumstances such as climate differences and population growth. The City of Corona disagrees with capping the adjustments at 4% and requests SWRCB increase the cap to 8% or 12%. Even an eight percentage point cap would fairly and equitably reflect the efforts made by water suppliers with consideration to the unique and uncontrolled circumstances that drive water usage in their area.

Ms. Kathy Frevert

Page 6

January 5, 2016

**Prohibition Against HOAs Interfering with Conservation Actions**

The City of Corona appreciates the SWRCB's support in prohibiting homeowner's associations from interfering with certain conservation actions. We support this recommendation.

The City of Corona understands both the Governor's and the SWRCB's position; we know that continued action must be taken to safeguard the State's water supplies. We have developed our community responsibly and have planned for water supplies to meet those needs. We ask the SWRCB to consider our comments as the Regulatory Framework for Extended Emergency Regulations for Urban Water Conservation are finalized.

We thank you for your time and consideration in this matter. Should you have any questions, please feel free to contact me at (951) 736-2477 or by e-mail at [Jonathan.Daly@ci.corona.ca.us](mailto:Jonathan.Daly@ci.corona.ca.us).

Sincerely,



Jonathan Daly  
General Manager