

Comment Letters

From: Shannon DeLong [mailto:sdelong@downeyca.org]

Sent: Wednesday, January 06, 2016 10:16 AM

To: Frevert, Kathy@Waterboards

Cc: Jaime Minor - Niemela Pappas & Associates (minor@npalobby.com); Emily Pappas (pappas@npalobby.com)

Subject: Comments Re: Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation

Good morning,

Below are comments from the City of Downey regarding the proposed regulatory framework for Extended Emergency Regulation for Urban Water Conservation:

- Simplify the “Growth Adjustment” calculation for residential connections to match that proposed for new commercial, industrial, and institutional customers. For example: Number of new residential connections since 2013 multiplied by the average residential water use per connection from February through October 2015
- “Provide a one-tier (four percentage point) reduction to the conservation standard of urban water suppliers using new drought resilient water supplies” – this credit should be clarified to provide credit to any agency that has maintained such prudent water conservation practices after 2013, regardless of whether it existed prior to 2013 or not. Although there are many groundwater basins throughout the State that are not managed, there are also many that are actively managed and currently in good standing. Many such Basins, like the Central Groundwater Basin in which the City of Downey resides, are Adjudicated via past court Judgments and specifically limit the amount of water that may be pumped from the Basin on an annual basis. In an effort to prepare for droughts such as the one the State is currently experiencing, agencies within the Central Groundwater Basin have spent significant funds to the Replenishment District to purchase and store recycled water in the Central Basin which has been subsequently used via indirect potable water reuse (groundwater pumping) by the agencies within the Central Basin for years. Agencies and Basins should not be penalized for having the foresight to develop such drought proofing water supplies in years past by limiting this credit to only those supplies developed after 2013. Please modify the proposed credit language to allow for such credit regardless of when the drought resilient water supply was developed, so long as it was in effect after 2013.
- “Groundwater Credit” – recommend amending the proposed groundwater credit to only include storage of storm water for indirect potable water reuse. Same comment as bullet above. In some adjudicated Basins, this has been practiced for years and should be recognized so long as it is in effect after 2013 regardless of when the practice first went into effect.
- In lieu of extending the Emergency Regulation through the end of October 2016, perhaps it should be extended through the end of May 2016. Doing so would allow the effects of the precipitation received from the winter and El Nino months to be fully accessed before burdening the already financially strapped water agencies to commit more money and resources.

Best regards,

Shannon DeLong

Comment Letters

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