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April 14, 2014

Jessica Bean  
State Water Resources Control Board

Submitted via email: [jessica.bean@waterboards.ca.gov](mailto:jessica.bean@waterboards.ca.gov)

Re: Comments / Suggestions for the Mandatory Conservation Proposed Regulatory Framework

Ms. Bean,

Thank you for the opportunity to provide comments and suggestions on the proposed Mandatory Conservation Proposed Regulatory Framework for the Governor's April 1, 2015 Executive Order B-29-15. The City of Turlock recognizes and appreciates the severity of the drought facing our great State. We have taken a very proactive approach to water conservation including developing solutions for additional water supplies in our region. Such efforts require a significant investment in time, resources and funding.

The current drought is a great opportunity for urban and agricultural water users to work together and commit to finding regional solutions to our water resource challenges. Below are the City of Turlock's comments and suggestions on the Proposed Regulatory Framework.

First, in apportioning water supply reductions, the proposed use of September 2014 R-GPCD water use as a reasonable basis for the five categories does not seem appropriate for all regions throughout the State. Due to the vast climate variations, September penalizes drier regions and rewards more temperate regions. For example, along many coastal regions during the month of September it tends to be cooler and wetter; therefore, the evapotranspiration is much lower. The State of California has already implemented a precedent for recognizing that water demands vary through the State due to the various climate zones. Specifically, the State Department of Water Resources (DWR) developed the Model Water Efficient Landscape Ordinance in 2009 to assist water agencies in the implementation of the Water Conservation in Landscaping Act of 2006 (AB 1881, Laird). That document (Appendix A) includes a Reference Evapotranspiration Table that clearly shows how evapotranspiration rates (and hence water landscape irrigation demands) vary throughout the State. Perhaps the requirements of the Proposed Regulatory Framework could accommodate the document's water demand variability and adjust R-GPCD accordingly – perhaps the creation of an indoor water use target (based on household size) and an outdoor water

use target based on both property size and evapotranspiration rates would be an appropriate solution.

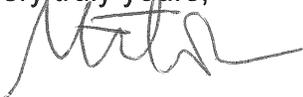
Second, by using 2013 as a reference point, the State is ignoring the progress many agencies have already made in complying with the requirements of the Water Conservation Act of 2009 (SBx 7-7). As you recall, agencies were required to implement a 20% reduction in water use by the year 2020 using a 10-year average. Water agencies were required to memorialize their commitment to these water use reduction targets by adopting water use reduction targets and water conservation plans in their 2010 Urban Water Management Plans. Unfortunately, the proposed Regulatory Framework fails to give credit to water providers such as Turlock who have worked hard to reach their water reduction targets ahead of the 2015 and 2020 deadlines of the 2009 Water Conservation Act.

Finally, if we are truly interested in saving potable water, then the Regulatory Framework should recognize and give credit to those agencies for their use of non-potable and recycled water. The use of non-potable and recycled water is a direct reduction in consumption on a 1:1 benefit. Therefore, we propose that agencies utilizing non-potable and recycled water get a 1:1 credit in reduction of their water usage. For example, in 2014 the City of Turlock provided 335 million gallons of recycled water to the Turlock Irrigation District Walnut Energy Center for cooling purposes and 145 million gallons of non-potable water for landscape irrigation uses for a total water savings of 480 million gallons. However, the City of Turlock does not get credit for this reduction.

In addition, we are partnering with other agencies to potentially provide 10 million gallons per day or 3,285 million gallons annually of recycled water for agricultural irrigation purposes to an agency that had a zero allocation of irrigation water for 2014 and 2015. Our investment in this additional supply is a direct offset and benefit to the limited water resources in our region.

The City of Turlock has always been a leader in our community and we feel we are a leader in water conservation. Therefore, we respectfully submit these suggestions and comments for your consideration. If you have any questions, comments or need additional information please contact Michael Cooke at (209) 668-5590 or [mcooke@turlock.ca.us](mailto:mcooke@turlock.ca.us).

Very truly yours,



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