



January 27, 2016

State Water Resources Control Board
PO Box 100
Sacramento CA 95812-0100
Attn: Clerk to the State Board



RE: 2/2/16 Board Meeting (Conservation Extended Emergency Regulation)

Dear Clerk to the State Board,

Thank you for the opportunity to provide comments on the January 15, 2016 Proposed Text of Conservation Extended Emergency Regulations. Although we greatly appreciate the proposed changes that were made to address differences in climate throughout the state, we do not feel that the proposed changes go far enough to address the fundamental inequities built into the emergency regulations or to prevent the further die-off of trees and vegetation.

The City of Lincoln and our partners in the region have expended considerable resources in order to develop conjunctive use water systems, to secure water assets for current and future needs and to enhance water supply sustainability. Specifically, the City of Lincoln has a robust reclaimed water system, a sustainable groundwater management program, and has secured adequate surface water supply through our wholesale water providers. Additionally, the City has spent considerable resources on future planning efforts to ensure our long-term demands can be met prior to allowing future growth. As such, it is not fair or equitable that other communities that have not completed such extensive planning or sound implementation practices be assigned a lower water conservation standard, while they have allowed growth to continue on unsustainable water supplies.

The assigned conservation tiers should be modified to address the vast discrepancy in water conservation tiers and the maximum conservation standard should be 25%.

Under the current regulations, the City of Lincoln was assigned a conservation standard of 32%. This has resulted in the following negative consequences:

- **Loss of Trees and Vegetation:** The City lost numerous trees and vegetation as a result of the conservation standards. Due to the 32% mandated restriction, the City was forced to limit watering to two-days per week. Two days per week of outdoor irrigation is not adequate to prevent trees from dying. Even with the proposed reduction allowed for climate differences, the City of Lincoln would be assigned a conservation standard of 29%. This will not allow the City to increase watering this coming

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summer, which will cause more trees to die.

- **Loss of Revenue:** During the months that the City conserved 32% or more, the City experienced a significant loss of revenue. **This loss in revenue reduces our ability to replace aging water lines, to replace old or outdated meters with water meters that allow for greater tracking of water use, and also decreases our ability to pay for our robust water conservation program.**
- **Loss of Turf:** The significant loss of turf within the City has impacted our residents' ability to sell homes. When home sales are considered on a regional basis, it is difficult to compete with a neighboring City that has not had to limit outdoor water irrigation to the level that we have. It is unfair that our residents should have to bear a greater economic impact in comparison to other communities.

As such, we recommend that the allowed reduction in conservation standard due to the climate adjustment be increased to allow for a level of irrigation that will not continue the die-off of trees and vegetation. The climate adjustment reduction standard should be doubled for each category. We estimate that we can achieve approximately an 8 to 10% reduction in total potable water demand during the summer months when restricting outdoor water irrigation by 1 day. Therefore, going from a 32% to 29% conservation standard will not allow the City to ease our outdoor water restrictions. If we are unable to allow three days of outdoor irrigation water, we anticipate even further die-off of trees. Doubling of the allowed climate adjustment would allow the City to save many of the already distressed trees and vegetation. We propose our conservation standard further be reduced from 29% to 25%.

Although we understand that compliance is measured on a cumulative basis, we have consistently found it very difficult to achieve significant water reductions during the winter months. The majority of the homes within the City of Lincoln are newer homes and therefore they have a high level of indoor water conservation measures. Therefore, we have reduced opportunity for significant water conservation in the winter months. As such, we strongly recommend that consideration be given to the adoption of a seasonal water conservation standard that is feasible to achieve. The City should not be in the position of having to kill off vegetation in the summer months to meet an unattainable standard in the winter months. **We recommend a winter conservation standard be developed that is 20% less than the regular conservation standard.** For example, with our proposed conservation standard of 25%, the winter conservation standard would be reduced to 20%, which is a more attainable goal.

Should you have any questions or require additional information, please do not hesitate to contact me at (916) 434-3250.

Sincerely,



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City of Lincoln

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