January 28, 2016

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Dear Ms. Townsend:

EXTENDED EMERGENCY REGULATION FOR WATER CONSERVATION (COMMENTS)

It is to our understanding that the State Water Board will consider a proposed Emergency Regulation at its February 2, 2016 public meeting. We appreciate the opportunity to provide comments to the proposed Emergency Regulation.

The City of Lynwood (City) is committed to conserve water given the drought conditions. At this time the City’s conservation goal is at 16 percent.

In a project funded by the American Water Works Association, according to the most recent U.S. Geological Survey report of estimated water use in the United States, it is estimated that the residential water demand is reported to average about 98 gallons per capita per day (gpcd). The City’s residential gpcd is at 33 for November 2015, which is well below the U.S. gpcd average and the November 2015 Statewide average residential gpcd of 75.

The City is zoned primarily for residential use. Water consumption characteristics in the City are low to moderate due to socio-economic conditions and the City’s commitment to efficient water use. The City was able to demonstrate strides towards reaching the 16 percent conservation goal during the hotter months. However, in the cooler months, for example, the City’s residential gpcd for November 2013 base year is already low thus, making it more difficult to conserve at the same rate.

Although the 2013 base year gpcd was already lower than the 2015 Statewide average, nonetheless, in the hotter months, outdoor water use was reduced. However, in cooler months, it has been a struggle to achieve the conservation mandate, since
now residents would need to further reduce indoor water use, which is already at a very low gpcd level.

The City urges the State Water Board to consider the gpcd levels for the base year, along with the socio-economic conditions, as well as the effort that the City has accomplished, prior to setting the water conservation mandates in the emergency regulations being considered for the extension. Based on this we further urge the State Water Board to consider reducing the City’s conservation standard; we would welcome the opportunity to discuss with your staff what a more appropriate target should be for Lynwood.

Sincerely

[Signature]

Raul Godinez II, P.E.
Director of Public Works/City Engineer

Cc:

Arnoldo Beltran, City Manager, City of Lynwood
Senator Ricardo Lara
Assembly Member Anthony Rendon