Comment Letters

State Water Board Representatives,

The City of Walnut Creek would like to offer the following comments on the proposed 2016 Extended Mandatory Water Conservation requirements dated December 21, 2015.

Staff recommendations under the section for “Climate adjustment” (pages 1&2), propose a climate adjustment of up to 4 percentage points for suppliers in warmer climates.

Regarding “Climate adjustment” referenced on pages 1&2, evapotranspiration (ET) should not be a factor. Since warmer zones and cooler zones both experience a rise in temperature within microclimates, we would recommend that all areas of the state be equal in their efforts for conservation, thus no need for a “Climate adjustment”.

Logically, warmer zone area have had decades to install and manage drought tolerant plant material and thus might be better prepared than cooler areas of the state. It is cities located within cooler zones that have not been prepared for the drought and rise in temperature and thus stand to lose the most. The Climate adjustment section currently implies that warmer climate in California has more of a negative impact in the warmer zones than cooler zone areas.

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