



April 14, 2016

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Transmitted via email to the Clerk of the Board at
commentletters@waterboards.ca.gov.

RE: COMMENT LETTER-URBAN WATER CONSERVATION WORKSHOP

Dear Ms. Townsend:

Thank you for the opportunity to comment on potential adjustments to the February 2016 Emergency Regulation and possible State Water Resources Control Board (State Water Board) action in response to recent increases in precipitation and corresponding water supply improvements. We are pleased that the State Water Board is considering modifications to the existing regulations.

In light of the precipitation experienced in Northern California we have the following input to the questions provided by the State Water Board:

1) *What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?*

- The mandatory nature of the water conservation requirements should be rescinded in areas of the state that are experiencing relatively normal or better hydrologic conditions. If they are not rescinded we offer additional recommendations that are included below.

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- Reduce the existing emergency regulations for water suppliers located in areas of the state that have experienced normal or close to normal precipitation levels. This could be accomplished by developing a water conservation standard that is related to the percentage of normal precipitation experienced on a regional basis.
- Allow for additional types of drought resilient source supply projects to qualify for conservation standard reductions. Currently, the types of projects that are allowed for the drought resilient supply credit only benefit coastal communities and southern California. This is inherently unfair to other regions in the state. Any project that reduces potable water or raw water demand (such as reclaimed water projects) should qualify for a reduction.
- If the water conservation mandates are reaffirmed, there should be a separate winter season conservation standard. Over the past year it has been evident that in most areas of the state it is not feasible to meet the required water conservation standard in the winter months. Setting a conservation goal that is not feasible is not good practice and does not help to facilitate compliance. We recommend that a winter conservation standard tiered structure be developed that is half of the existing tiered structure.

2) How should the State Water Board account for regional differences in precipitation and lingering drought impacts, and what would be the methods of doing so?

- In areas of the state where normal to close to normal precipitation has been experienced, reductions in required conservation targets should be made.

3) To what extent should the State Water Board consider the reliability of urban water supplier supply portfolios in this emergency regulation?

- The reliability of any specific urban water suppliers supply portfolio, whether secured by actual water rights or through contract, should be the only basis for implementation of the regulations. The reduction in deliveries should only be determined based on actual supply shortages experienced by any one supplier and should be determined and implemented by only that specific supplier.

Please let us know if you have any comments or any further questions.

Sincerely,



Jennifer Hanson
Public Services Director
City of Lincoln