

Subject: RE: City of Redding Comments - draft Regulations - Round 2

Ms. Bean,

Thank you for the opportunity to provide comments on the draft regulations implementing a 25 percent statewide reduction in potable water use. I commend the Water Board Staff in their efforts to develop the regulations and allowing urban water suppliers like the City of Redding the opportunity for constructive feedback. Following are key comments from the City of Redding:

Conservation Standard for Urban Water Suppliers

Our greatest concern with the new regulations is the lack of recognition for the diversity in climate and land use in the State. The Fact Sheet acknowledged that many had commented on these factors but discounted the comments because they were (a) accounted for in the State's 20x2020 plan and are only relevant to a longer term conservation approach and (b) that the tiers give many communities in the hotter, inland areas a lower conservation than they would have otherwise been subject to. I do not agree that these points nearly address the inequity in the proposed tiering system.

In my relatively quick review of the data base I did not find a valley community north of Modesto that was in a tier lower than 7 with nearly all in Tier 8 or 9. Climate certainly is a very big factor as like properties in the valley will need more water than the same type property in the Bay Area. In addition, the land use in the valley since California began developing has generally been more rural with larger lots sizes (and related higher water demand) than the Bay Area and other communities along the coast. I absolutely believe the higher gallons per capita water demand for valley compared to coastal communities does NOT mean the home owner in the valley is any less conservation minded than the Bay Area home owner. Yet the regulation rewards the Bay Area (and other coastal community) homeowner and demonizes the Valley home owner. I really don't think it can be denied that climate and land use are, in general, at the core of the differences and not conservation practices.

POTENTIAL SOLUTION: I appreciate that the Board Staff is in a tough position trying to put together a regulation that will result in real savings today. Tomorrow doesn't help. A fairer approach may be a simple valley vs. coastal communities analysis that calibrates/pro-rates each based on recognized conservation practices to date. For example, Davis is recognized by many as a progressive community and may be (along with a few other communities) setting a conservation standard that the Board could use to "set the bar" for valley communities. There is probably another set of poor performer communities that set the high end of the bar. The low end of the bar could be set at 15 percent and the high end at 35 percent and all other suppliers prorated in between accordingly. This is certainly a very simple approach that accounts for climate and to a lesser extent (but better than current process) land use.

Land use could be better factored in. Even the valley is characterized by urban and rural areas although the urban areas are much less dense than many coastal communities. A density (population per square mile) for an "urban" compared to "rural" area could be established and a similar conservation proration as summarized above could be done for "urban-valley" and "rural-valley".

The entire State could be done with two or three simple climate zones (coastal, valley, other). I did a quick google search for climate zones in California and the map below popped

up. Obviously it could be further dissected but a simple approach like this would be much more fair than the one currently be taken.

Some other thoughts:

- **Tiers Based on 2013 Numbers** – maybe tiers should be based on 2013 numbers which also recognize long term conservation efforts but aren't skewed by the craziness of last summer when communities were jumping from limited conservation to voluntary to mandatory conservation.
- **Adjustments** – we believe that recycling in some manner (we think we recycle by returning one gallon to the Sacramento River for every three that we take out) should be taken into account in some manner. Our “recycling” efforts mean that downstream agriculture users, M&I users, and the environment have more water to draw from and this effort should be rewarded in the process. In addition, we note there is a 4 percent adjustment for urban water suppliers that don't take groundwater, do not import water from outside the area, and had average 2014 precipitation. From my perspective this sends a mixed message that “recycled” water conservation practice is not important while conservation is not as important in communities with good water sources.

Despite the above, Redding is absolutely committed to water conservation in this drought. We implemented voluntary measures last winter that resulted in double digit conservation early in the year. Later in the summer we were the first in our area to implement mandatory measures (3 days of the week, limited hours, all State prohibitions, etc.) that increased that conservation to a total of over 17 percent by the end of the calendar year. Not to mention the tiered rates and other conservation measures we have implemented in recent years. We absolutely believe we should do more but am at a complete loss as to how we are going to get to 36 percent. I am sure we are not alone in the valley with these concerns...

Note that City of Redding is an ACWA member and I was very supportive of their last comment letter and the comments made at yesterday's webinar. I have not seen the alternative they will be submitting but am in support of their general position on the regulations better recognizing climate and land use along with more consideration of key adjustments.

Again, thank you for the opportunity to provide comments. I certainly hope we can come up with something that works for all and results in meeting the Governor's goals.

Brian Crane, Director
City of Redding – Public Works

California Climate Map:

- Climate Zones**
- Hot-Humid
 - Mixed-Humid
 - Hot-Dry
 - Mixed-Dry
 - Cold
 - Very Cold
 - Subarctic
 - Marine

