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December 2, 2015

State Water Resource Control Board
Attn: Jeanine Townsend, Clerk to the Board
1001 I St 24th floor
Sacramento CA 95814



Re: Comments / Suggestions on Proposed Extension of the Emergency Regulation for Statewide Urban Water Conservation (Emergency Regulation) for the Governor's April 1, 2015 Executive Order B-29-15

To Whom It May Concern:

Thank you for the opportunity to provide comments and suggestions on the potential extension and modification of the existing Emergency Regulation for Statewide Urban Water Conservation (Emergency Regulation) for the Governor's April 1, 2015 Executive Order B-29-15 including a mandatory 25% statewide reduction in urban water use.

The City of Turlock recognizes and appreciates the severity of the drought facing our great State. Turlock has taken a proactive approach to water conservation, including solutions for an additional water supply for our region. This comes with a significant investment, resources and funding. However, it is a great opportunity for urban and agricultural water users to come together during these extreme situations to demonstrate a commitment towards finding regional solutions. Below are the City of Turlock's comments and suggestions on the potential extension of the Emergency Regulation.

- R-GPCD is used as the basis for determining the target reductions for each agency; however the targeted reduction goal is applied to total water production. This unfairly penalizes industrial uses, as they have very little outdoor landscaping to reduce their usage. Therefore, the City of Turlock recommends that if R-GPCD is used as the measure to set the targeted reductions, then *only* residential usage should be considered for compliance – industrial usage should be excluded.
- In apportioning water supply reductions, utilizing July through September 2014 R-GPCD water use as a reasonable basis for the five categories is not appropriate for all regions throughout the State. Due to the vast climate variations, this timeframe punishes drier regions and rewards more temperate regions. For example, along many coastal regions

during the months of this timeframe it tends to be cooler and wetter; therefore, the evapotranspiration is much lower. The State of California has already implemented a precedent for recognizing that water demands vary through the State due to the various climate zones. Specifically, the State Department of Water Resources (DWR) developed the Model Water Efficient Landscape Ordinance in 2009 to assist water agencies in the implementation of the Water Conservation in Landscaping Act of 2006 (AB 1881, Laird). That document (Appendix A) includes a Reference Evapotranspiration Table that clearly shows how evapotranspiration rates (and hence water landscape irrigation demands) vary throughout the State. With that said Turlock recommends the requirements of the proposed extension of the Emergency Regulation accommodate the regional evapotranspiration variability and adjust R-GPCD accordingly.

- The focus for water conservation should be on outdoor landscape watering. In Turlock's region, approximately 40% of the overall annual water use is for outdoor landscape watering. During the summer months (June through September) the outdoor landscape watering is approximately 60%. Turlock has implemented a successful appliance rebate program to reduce the indoor water usage. Therefore, the greatest opportunity for water conservation for our region is to focus on reducing outdoor landscape watering during the summer months.
- Residential growth should be factored into the equation. As the region rebounds from the recession Turlock is experiencing growth. However, Turlock is held to a 32% reduction target based on 2013 usage. This makes it extremely difficult, if not impossible, to meet the target. The City of Turlock recommends the 2013 usage be increased by the R-GPCD for the additional growth.
- Due to the drought and the mandatory reduction target of 32% Turlock's urban tree canopy has been impacted by approximately 200 trees that are either dying or have died and need to be replaced.
- The 32% target for overall water reduction unfairly penalizes the City of Turlock and job growth. Industrial usage is based on demand from the agricultural needs. The agriculture in the region is growing which results in the water use of industrial customers to increase as well. Additionally, there is little opportunity for industrial businesses to conserve water without impacting their business due to the fact that they have minimal outdoor landscaping. In order for the City to meet the 32% target, other customer classes (i.e. single family residential) must reduce even more. If industrial customers were to reduce their water usage by 32%, they would likely reduce the amount of work and jobs or even worse, shutter the business. Employment and job growth are economically vital for any City. Turlock recommends the targeted reduction be required only for the residential and landscape customer classes. This would allow for continued job growth and the greatest opportunity for water conservation.

- The City of Turlock is partnering with other agencies to potentially provide 10 million gallons per day or 3.285 million gallons annually of recycled water for agricultural irrigation purposes to an agency that had a zero allocation of irrigation water for 2014. This has a potential economic value of \$67.5M annually. Turlock's investment in this additional supply is a direct offset and benefit to the limited water resources in the region. As a result of this approach to water conservation it is safe to say Turlock has reduced demand significantly. It is recommended this water be counted as an offset to Turlock's supply.

The City of Turlock has always been a leader in the region and we feel we are a leader in water conservation. These suggestions are respectfully submitted for your consideration. If you have any questions, comments, or need additional information please contact Michael Cooke at (209) 668-5590 or mcooke@cityofturlock.ca.us.

Sincerely,



Michael Cooke