

PUBLIC WORKS - ENGINEERING
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April 14, 2016



VIA EMAIL TO commentletters@waterboards.ca.gov

Felicia Marcus, Chair
and State Water Resources Control Board (SWRCB)
1001 I Street, 24th floor
Sacramento, CA 95814

Attn: Jeanine Townsend, Clerk of the Board

SUBJECT: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus and Board Members D'Adamo, Doduc, Moore, and Spivey-Weber:

The City of Redding (City) looks forward to the April 20 public workshop on the SWRCB's extended emergency urban water conservation regulation. We are encouraged that the Board is considering adjustments to the February 2016 Emergency Regulation in response to increased precipitation and improvements to drought conditions across the state since February 2016.

The City of Redding owns and operates its own Water Utility. Our water supply includes surface water (primarily CVP settlement AND service contracts) and groundwater (17 wells) totaling in excess of 40,000 acre feet. The City serves a population of 90,000 people through 28,000 connections and in 2015 had a demand of just over 24,000 acre-feet.

While we appreciate there are areas of the State that continue to experience precipitation and snowpack levels below average, our area's situation has improved substantially. The winter in the North State produced above average rainfall (120 percent of average) and snow covering the mountains around us (near average). As a result our customers have seen Shasta Lake fill, moving Reclamation toward flood control releases at Keswick that resulted in flows through our City (less than 10 miles downstream) at over 20,000 cfs. Our customers also note that the ample aquifer we share (Redding Basin, estimated at a capacity in excess of 6 million acre-feet) has fully recharged as a result of the well above average rainfall the area has received. We understand we are not out of the drought yet but believe the State should adjust current regulations to better align with regional conditions. Not doing so will risk the public's confidence in government, cooperation with conservation measures, and the significant progress Redding has made to this point.

We now would like to take this opportunity to comment on the three questions that the SWRCB has solicited in advance of the workshop.



April 14, 2016

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

Any modification to the existing regulation should consider the following: There has been much momentum gained with the emergency regulation that should not be lost. The SBx 7-7 measures implemented as part of our Urban Water Management Plans should be better considered in the process. Additionally, the Association of California Water Agencies (ACWA) and the California Municipal Utility Association (CMUA) are developing a proposal for a longer-term water use efficiency framework that strengthens the water conservation processes already in place. The proposal identifies the Department of Water Resources as lead for incorporating changes to the Urban Water Management Plans that include local-agency developed enforceable water use efficiency performance targets, and more robust Water Shortage Contingency Plans. In general, we support the ACWA and CMUA efforts.

We also assume the Board will be interested in short term water prohibitions and targets to help meet statewide conservation targets. Although the State did make some allowances for local climate and source capacity in the January update, we don't believe it went far enough. The climate adjustment which included a maximum of 4 percent was not enough to truly reflect the difference in climates in our diverse State. In addition, there was no consideration of land use, which is a concern as both urban and rural existing demands should be accounted for in some manner. Finally, the winter has all but relieved many areas in the State of source capacity concerns and this reality should be taken into account with revised targets.

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?

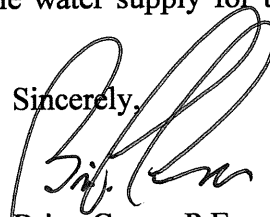
As noted above, source capacity should be a consideration in establishing targets. We recognize that we are "not out of the woods yet" and we don't want to lose the momentum we have gained in public recognition of California water supply, climate change, and need for continued conservation. A fairer scenario for considering regional differences might include establishing North-Central-South specific targets with further recognition of source capacity for setting individual urban water supplier targets.

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

Please refer to our answers above.

The City of Redding appreciates the opportunity to comment on this important issue. We look forward to working with the Board to ensure a sustainable water supply for the state with the local flexibility that California's citizens require.

Sincerely,



Brian Crane, P.E.
Director of Public Works