



CITY OF REDDING

FRANCIE SULLIVAN, MAYOR

777 Cypress Avenue, Redding, CA 96001

P.O. Box 496071, Redding, CA 96049-6071

530.225.4447 FAX 530.225.4463

April 10, 2015

W-030

The Honorable Ted Gaines
California State Senate
State Capitol, Room 3070
Sacramento, CA 95814

RE: State Water Board Proposed Regulatory Framework

Dear Senator Gaines:

The California State Water Resources Control Board (Board) this week released a draft regulatory framework for implementing Gov. Brown's April 1, 2015, Executive Order to achieve statewide reduction of urban potable water use of 25 percent. The Board has set an April 17 deadline for submitting feedback on this framework, which would mandate reductions of 10 percent to 35 percent in residential gallons per capita/day (R-GPCD).

The City of Redding fully recognizes the severity of the ongoing drought and the dire need to conserve precious water resources to the greatest extent possible. It likewise supports fair and equitable measures to ensure that all Californians immediately conserve water to the greatest extent possible. However, like a number of other water providers within your Assembly district, the City of Redding would be ordered to cut water consumption by 35 percent compared with that of 2013 – the maximum restriction required.

The Board has based its assigned restrictions on R-GPCD usage figures from September 2014, describing it as "a reasonable basis" for assigning the required levels of conservation. It has stated that measuring "summertime" usage is more equitable as the weather varies less year-to-year than in winter. While this may be the case, the Board's rationale does not take into account the significant geographic and climatological differences that exist within California, particularly in the month of September.

As you are well aware, September is among the hottest months in interior Northern California and particularly the City of Redding. In September 2014 – the benchmark month – Redding experienced an average maximum temperature of more than 92 degrees and 19 days over 90 degrees, typical of this time of year and atypical of many other locales in California with mild climates and minimal water use during this month. Consequently, Redding's 35 percent conservation requirement is based on water use during a month of extreme weather not experienced by most other regions of the state. In fact, had the month of October been selected as

the benchmark, Redding's usage figures would have been significantly lower, while those in coastal locales would have likely not changed. In essence, cities such as ours are balancing other regions requiring only 10 percent or 20 percent conservation. This simply does not seem fair.

Please understand that City of Redding water customers have not been ignorant of the calls to conserve water during the past year, even while the City's supplies have been adequate to handle typical demand. During the critically dry month of August last year, Redding customers reduced their demand by 25 percent. They increased that to 32 percent in November and 33 percent in December.

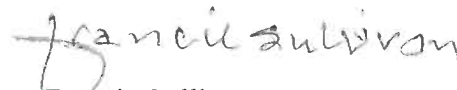
Other proactive conservation measures by the City include:

- Implementing tiered rates almost two years ago, becoming one of the few valley communities north of Sacramento to do so.
- Implementing voluntary conservation measures early last year, prior to Governor Brown's order, with significant results.
- Implementing hours/days of the week restrictions on irrigation, with excellent results.
- Modifying operations to greatly reduce the impact on use of surface water, allowing cold water to remain in the Sacramento River.
- Maintaining an efficient water-to-wastewater system that allows the City to discharge one gallon of water back to the Sacramento River for every three gallons taken out.

In the face of renewed orders to conserve statewide by 25 percent, we are confident Redding customers will rise to meet that call. However, more onerous conservation restrictions of 35 percent based on arbitrary benchmarks feel unfair in light of efforts already made.

We intend to provide comment to the Board regarding its proposed framework in hopes that adjustments will be made prior to final approval. We are sharing with you our viewpoint and, should the opportunity arise, ask your support in any manner possible to achieve a fair and equitable framework to effect this critical conservation of our water resources.

Sincerely,



Francie Sullivan
Mayor



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The Honorable Brian Dahle
California State Assembly
State Capitol, Suite 2158
Sacramento, CA 94249-0001

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