



City of Corona  
Department of Water and Power  
"Protecting Public Health"

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November 30, 2015

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

Re: Comment Letter – Urban Water Conservation Workshop

Dear Ms. Townsend,

The City of Corona Department of Water and Power ("City") is located in Riverside County and provides essential services to approximately 168,070 residents. Over the years the City has been working to reduce our water use by developing a reclaimed water system, an active water conservation program, and continuous efforts in providing our customers with safe reliable drinking water.

The City appreciates the opportunity to comment on the State Water Resources Control Board (State Board)'s request for input on the potential extension and modification of the existing Emergency Regulation for Statewide Urban Water Conservation (Emergency Regulation) if drought conditions persist into 2016.

We believe the following solutions should be considered in an extended Emergency Regulation mandate:

- a. The calculation used to determine the percent of reduction should be modified to a 12-month average. The current methodology takes the peak water usage months to calculate water suppliers' gallons-per-capita-day (GPCD). This has significant impacts on municipalities and districts that have extreme temperature swings from winter to summer months resulting in higher calculated GPCD which results in unachievable targets. Setting the GPCD targets based on a full year of water deliveries will be reflective of the water supplier's area and sets achievable targets for these water suppliers. This issue can be addressed by adding a weather variant factor or using the **annual** GPCD to determine mandated percent

reductions. If that option cannot be applied then a simple weather credit of 4% should be applied if an agency qualifies.

- b. Water suppliers that have implemented aggressive reclaimed water programs should receive a credit toward a water supplier's goal. This credit should be considered for actual reclaimed water consumption and to recognize proactive measures taken by water suppliers prior to 2013 and into the current year in expanding reclaimed water usage in their service area. This credit should be applied at 4% if an agency qualifies.
- c. Application of the mandated percent reduction should apply proportionately to the water supplier's water sources that are directly impacted by the drought. Therefore, secured groundwater and/or surface water production should not be included in the calculated total acre feet that a water supplier must reduce. For example, the City of Corona has a diverse water supply portfolio that includes 50% groundwater. The City's current drought mandate is a 28% reduction. We believe this should be 14% (50% of the 28% reduction).
- d. Water suppliers should receive a credit to the mandated percent reduction for water usage increases due to new construction projects, particularly State and Cal Trans projects that require water for dust control. The credit should be equal to the amount used and should be deducted from the water supplier's monthly production numbers.
- e. The State Water Resources Control Board should account for lack of precipitation during the year. This credit should be applied to all agencies ranging from 1 to 4% credit.

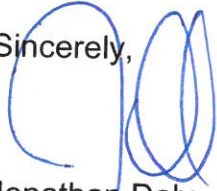
The above suggestions can be appropriated through a simple matrix chart that defines each category. For example, if a water supplier provides service in an area that sees temperatures greater than 90 degrees for 90 days they would get a credit of 4% (varying temperatures for varying durations would determine a percentage from 1-4%), and if a water supplier serves reclaimed water they would get a credit of 4%, and if a water supplier served greater than 45% of its supply from a local ground water basin (not imported from other areas) it would get a credit of 4%, etc. This can be limited to no more than a 16% credit to any agency regardless if they meet the criteria of other categories for control purposes. Each agency would need to make a case and have it approved.

The City of Corona believes it is imperative the State Board begin collecting weather data on the monthly reports. This includes temperature, evapotranspiration and humidity data for the current year and 2013. In addition the State Board should be collecting data for water used for construction specifically for State and regional projects. This number should be deducted from the production as it is temporary in nature.

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Thank you for considering the City's comments. Please don't hesitate to contact me if you wish to discuss this matter further. I can be reached at (951) 736-2477 or by e-mail at [jonathan.daly@ci.corona.ca.us](mailto:jonathan.daly@ci.corona.ca.us).

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'J' followed by several loops and a final flourish.

Jonathan Daly  
General Manager