



CITY OF REDDING
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**PUBLIC WORKS
ENGINEERING DIVISION**

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May 16, 2016

The Honorable Felicia Marcus, Chair
And Honorable Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: May 18, 2016, Board Meeting (Conservation Extended Emergency Regulation)

Dear Chair Marcus and Members of the Board:

The City of Redding Public Works Department appreciates the opportunity to provide comment on the draft amended emergency water conservation regulations. On a positive note, we appreciate the Water Board staff's proposal and the recognition that there are varying levels of supply and demand in the State and the related self-certification process proposed with the draft amended regulation. In addition, we appreciate the general direction from the Governor in extending his Order through January 2017 and directing the Department of Water Resources and the State Water Board to work together with urban water suppliers on a more sustainable, flexible, locally relevant long term water conservation plan.

State Water Board staff has asked for input on whether a "floor" of required minimum conservation should be included in the regulation. Although we recognize that the drought is not over and that there is much need in at least most of the State to continue aggressive conservation, we don't believe a "tops down" punitive minimum should be included in the regulation. The draft regulation has come a long way in recognizing the diversity of the State with a self certification process and a required minimum conservation level would be contradictory to this approach. We absolutely believe the City of Redding's customers, although in a great position from a water supply standpoint, have received the message and that the ongoing drought and growing pressures on the State's water supply have resulted in a more aware and conservation customer base. A State mandated minimum conservation level is not necessary and would not go over well in the Redding area. A voluntary, "we are all in this together", target might work fine.

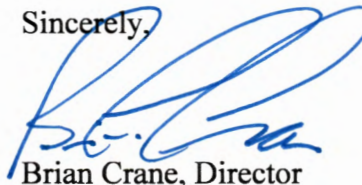
In addition, along with others in the State, we recommend some technical changes to the regulation including:

- Implementation Timeline – an additional week for compliance to better ensure urban water suppliers have good information on the supply and demand calculation.

- Conservation Standard First Year Calculation – use a calculation based on the first year instead of a highly conservative “worst case” condition associated with the third year hydrology.
- Demand Calculation Based on a Three Year Average Including 2015 – the three year average will better reflect lower water user demand in the face of continued drought conditions.

Again, thank you for the opportunity to comment on the draft regulation and Water Board staff’s apparent understanding that a “one size doesn’t fit all” approach doesn’t work in our diverse State and that a “self certifying” approach recognizing individual urban water suppliers climate, land use, water supply, and related demand will result in more buy-in and long-term conservation.

Sincerely,



Brian Crane, Director

City of Redding – Public Works Department

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c: Jon McClain, Assistant Director of Public Works
Elizabeth Hadley, Electric Program Supervisor
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