



CITY OF BLYTHE

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May 16, 2016

The Honorable Felicia Marcus, Chair
and 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 Board Meeting Conservation Extended Regulation

Thank you for the opportunity to provide input on the State Water Resources Control Board's proposed Conservation Extended Emergency Conservation Regulation. The City of Blythe supports the proposed framework which would require individual suppliers to self certify the availability of supplies to meet demand. As this framework is based on local conditions and accounts for differences in hydrologic conditions, it allows for local control on how to best manage a City's water resources.

The City of Blythe is a small agricultural community in eastern Riverside County located on the Colorado River. The City relies solely on groundwater to supply its 15,000 customers. Groundwater resources are ample for the City's needs now and in the distant future. It should also be noted that 50% of water used for farming in our area is diverted back into the Colorado River. Blythe is unique, which makes a one size fits all model ineffective for long term conservation. Conservation should be based on each City's individual needs which the proposed framework would accomplish.

Based on a review of the proposed regulatory framework, we offer the following response to the questions posed:

Conservation Floor:

If each agency is required to certify their water availability, a conservation floor would be unnecessary. Any projected shortages would be identified and it would then be the responsibility of the agency to correct any shortages accordingly. A Conservation floor would take away the control of each agency to manage their water system given by self certifying and would only burden water agencies that have ample water supplies and/or took steps to conserve long before it was a mandate.

Use of Water in Fountain or Decorative Features:

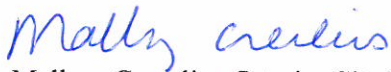
The City of Blythe understands the importance of turning off fountains and features that do not have a recirculating system. The water used in these features is wasteful when drought conditions exist. However, the City of Blythe has an average summer temperature of 110 degrees. Due to this extreme heat, the City asks that City owned and operated recreational facilities or sites be excluded from this mandate. Closing these sites due to this mandate would be a health and safety issue for our residents.

Orders Issued Under Previous Versions:

If each agency is self certifying, remaining under previous conservation orders issued under much different circumstances would be counterproductive. The City of Blythe is currently under a conservation order to conserve 28%. Under the proposed language Blythe would certify that ground water reserves are available to last for the foreseeable future. Our regional and hydrologic conditions alone should determine our new conservation floor. It should not be determined by previously issued conservation orders. If the City could not certify supplies to meet demand, any previously issued orders could be readdressed at that time. The City of Blythe respectfully requests to have this section removed from the proposed language to again give local control to implement measures to address any gaps in a system, or at a minimum, provide a mechanism to review the order with State Board staff.

In conclusion, the City of Blythe appreciates the State Board's proposal which recognizes hydrologic differences and other factors that affect water use, and that it encourages local investment into long term conservation. Again, thank you for your consideration of comments on the proposed drought regulation. Should you have any questions, do not hesitate to contact me at (760)922-6161.

Sincerely,



Mallory Crecelius, Interim City Manager
City of Blythe