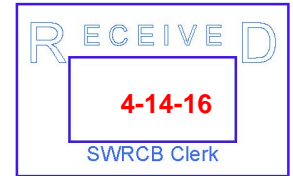




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April 13, 2016

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

Subject: Disproportionality of the Draft Emergency Regulations to Implement the Governor's Executive Order B-29-15

Dear Honorable Board Members:

The City of Corona appreciates the opportunity to provide the State Water Resources Control Board (State Board) comments regarding the potential modification of the Emergency Drought Regulation. We must all work to become more efficient, do our part to reduce water use and conserve this valuable and limited resource.

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

The City of Corona supports the attached simplified "Supply/Demand Management" approach proposed by several water suppliers rather than modifying the current protocol. However, if the current protocol is maintained, Corona recommends the following modifications:

- Adjust percent conservation mandate to reflect a water supplier's current water supply security so that mandated reductions only apply to unreliable water supply such as surface water and/or imported water supply.
- If no CIMIS or other weather station with validated ET data is within a water supplier's service area, allow for water suppliers to calculate a climate adjustment using the closest CIMIS station outside their service area, particularly if it is used for their billing water allocations. Allow water suppliers who were initially rejected for the climate adjustment to resubmit as new ET data from within their service area is identified and validated.
- Allow water suppliers to restart the calculation of their accumulative percent water savings with the implementation of the modified Emergency Regulation. Most water

suppliers with accumulative percent water savings less than their conservation mandates would not be able to reach their accumulative goal by October even with water use reductions of 40 to 50% each month from May to October. As we enter the second year of water conservation mandates it is essential that our community continues to be motivated to reach a realistic goal.

- Incorporate the average lot size in the calculation of the percent mandate.
- Allow credit for groundwater replenishment using tertiary treated wastewater.
- Provide a credit adjustment for dedicated irrigation meters converted to reclaimed water prior to 2013.

2) 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?

The City of Corona supports the proposed "Supply-Demand Based Emergency Drought Regulation Compliance Framework" as it most accurately matches mandated conservation levels with actual water supply scarcity conditions for each water supplier. It also requires water suppliers to be accountable by certifying that available supplies will meet demands and address potential ongoing drought conditions. The supply/demand based framework will also simplify the regulations as adjustments for regional variation in weather, population changes, and other factors, will no longer be necessary.

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

The City of Corona proposes that the State Board consider the reliability of water supply portfolios as the primary determination in setting the conservation mandates for each water supplier. This method ensures water conservation is achieved where there is water supply scarcity and urgency. To maintain secure and reliable water supply through potential ongoing drought conditions, the proposed framework requires water suppliers to meet projected water demands for an additional two years of drought.

In closing, we are all committed to doing our part. We understand the gravity of the situation we are in. We strongly encourage the State Board to modify the Emergency Framework to consider supply/demand conditions as the primary factor in setting conservation mandates.

Respectfully,



Jonathan Daly
General Manager

Attachment 1: Supply-Demand Based Emergency Drought Regulation Compliance Framework

April 2016

Basic Requirements

Three basic requirements would be included in a modified drought Emergency Regulation, as follows:

1. Imposition of the mandatory water waste restrictions and end user requirements included in the current Emergency Regulations that apply to all Californians;
2. Submittal by the urban water supplier¹ of monthly reports to the State Water Resources Control Board on total potable water production, residential gallons per capita per day water use, current stage of the supplier's Water Shortage Contingency Plan, and agency mechanisms to implement water waste restrictions; and
3. Requirement that an urban water supplier demonstrate through the Water Shortage Contingency Plan adopted by its governing body the ability to implement mandatory use reduction.

Supply/Demand Management

Target demand reductions would be revised for the remaining period of the current drought Emergency Regulation based upon a supply deficiencies identified by urban water suppliers. Urban water suppliers will submit:

1. A certification of supplies and demand to determine the targeted demand reduction ("Conservation Standard"), based upon the identified supply deficiency. Certifications will be prepared by the urban water supplier must be signed by a representative authorized to take such actions on behalf of the governing body of the supplier.

Supply Deficiency	Target Demand Reduction
0-5%	0-5%
5-10%	5-10%
10-15%	10-15%
15-20%	15-20%
20% or more	20% or more

2. A supplemental analysis demonstrating that the urban water supplier can meet projected demand through supply management, new supply augmentation and/or Water Shortage Contingency Plan conservation actions for an additional two years of drought.

Benefits of Proposed Approach

- Ensures a baseline level of conservation through water the imposition of waste restrictions;
- Calibrates the targeted demand reduction to the actual severity of shortages in water supplies for each water provider;
- Provides a strong incentive for local investments in sustainable supplies, water banking and storage and water use efficiency programs;
- Eliminates the need for credits and adjustments relative to local factors that influence water use such as climate, growth, and past conservation investments;
- Requires planning for multi-year supply and demand scenarios and potentially extended drought conditions; and
- Requires agencies to have effective Water Shortage Contingency Plans and extraordinary conservation measures in place to ensure demands do not exceed available supplies.

Example of Drought Year Supply Certification plus Two Year Sustainability Evaluation

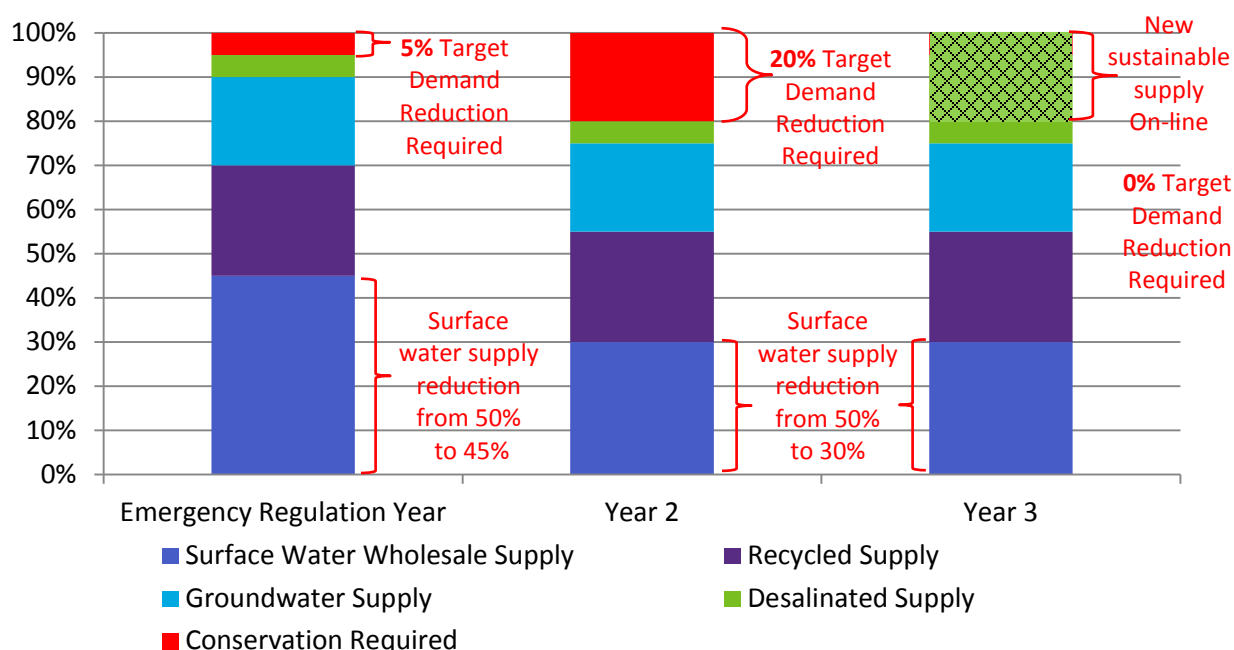
¹ As defined by the current Emergency Regulation

An urban water supplier shall certify supply and demand through the end of the year covered by Emergency Regulation and shall evaluate the sustainability of supplies for two additional years under a continuous drought scenario.

In this hypothetical agency example:

- Supplies are comprised of 50% surface water provided by a wholesale agency, 5% desalinated water, 25% recycled water and 20% groundwater;
- Hydrologic conditions are dry in the initial year with surface water supplies reduced from 50% to 45% of available supply;
- In year two and year three, the severely dry hydrologic conditions cause surface water deliveries to be impacted further, reducing to 30% of available supply;
- In year three, a new desalination facility is brought on-line that provides an increase in 20% of the agency's available supply; and
- Demand is based on a three year average.

Example Water Supply Conditions



Emergency Regulation annual reporting requirements would include consist of the following:

Water Supply Source	Emergency Regulation Period Supply Availability	Sustainability Analysis Year 2 Projection	Sustainability Analysis Year 3 Projection
Surface	45,000 AF (10% reduction)	Up to a 40% reduction	Up to a 40% reduction
Recycled	25,000 AF	No reduction	No reduction
Desalinated	5,000 AF	No reduction	New production of 20,000 AF (20% supply increase)
Groundwater	20,000 AF	No reduction - management plan in place	No reduction - management plan in place
Total	95,000 AF	80,000 AF	100,000 AF
Base Demand	100,000 AF	100,000 AF	100,000 AF
Required Action	Implementation of 5% Mandatory Demand Reduction	Implement Plan for 20% Mandatory Demand Reduction	No Demand Reduction Required