



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

Office: 951.736.2234
Fax: 951.735.3786

755 Public Safety Way
Corona, CA 92880 – www.CoronaDWP.org



January 27, 2016

Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 92815-0100

Subject: 2/2/16 Board Meeting – Item 7 (Conservation Extended Emergency Regulation)

Dear Ms. Townsend:

The City of Corona appreciates the opportunity to comment on Item 7 (Conservation Extended Emergency Regulation) for the February 2, 2016, State Water Resources Control Board (SWRCB) Meeting. We understand the State of California faces many challenges, and we support the Governor's continued commitment and the efforts by the SWRCB to address these challenges as the drought continues. We also appreciate the SWRCB efforts to make regulations more fair and equitable to water suppliers throughout the state while setting a framework that maintains the water conservation standards for the State.

The City of Corona supports staff recommendations to incorporate a climate adjustment in the Emergency Regulations that would reduce the conservation requirement by up to 4 percentage points for water suppliers located in the warmest regions of the state. The City of Corona does not agree with SWRCB staff that the regional climate zone average ETo be used in the calculation of a water supplier's average ETo for the climate adjustment. We recommend using the more accurate and representative local California Irrigation Management Information System (CIMIS) weather station that is in or closest to the water supplier's service area. Under the SWRCB staff recommendation the City of Corona falls under zone 6 which includes west Riverside County, parts of San Diego County, and most parts of Orange County including areas near the coast with significantly more moderate climates than Riverside County. The City of Corona uses the data from the University of California Riverside's CIMIS station to calculate customer water allocation for our water budget-based rates as this station best reflects the local climate conditions within our service area. We strongly recommend the Board allows for local CIMIS weather station data to be used that fairly represents ETo averages in the calculation of the climate adjustment.

Ms. Jeanine Townsend

Page 2

January 27, 2016

The City of Corona, like other water suppliers, is eligible under multiple adjustment categories for our proactive conservation efforts and for uncontrolled circumstances such as climate differences and population growth. The City of Corona strongly supports Scenario 3 in the credit adjustment recommendation by the SWRCB staff which provides water suppliers up to an eight percentage point credit toward their conservation target.

The City of Corona appreciates the opportunity to provide comments for consideration on the Regulatory Framework for Extended Emergency Regulations for Urban Water Conservation. We thank you for your time and consideration in this matter. Should you have any questions, please feel free to contact me at (951) 736-2477 or by e-mail at Jonathan.Daly@ci.corona.ca.us.

Sincerely,



Jonathan Daly
General Manager