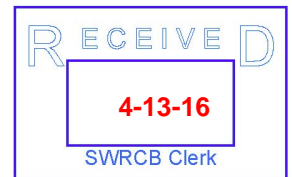




**City of Clovis**  
**Public Utilities Department**  
155 N. Sunnyside Avenue, Clovis, CA 93611 (559) 324-2600



April 13, 2016

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

Dear Ms Townsend:

Subject: Comment Letter - Urban Water Conservation Workshop

In response to the Board's request for public input on the February 2016 Emergency Regulation, the City of Clovis, has the following comments:

The City of Clovis, which is located in the Kings Basin is served surface water from the Fresno Irrigation District. This supply is utilized for operation of both our surface water treatment plant and for groundwater recharge activities. Fresno Irrigation District is projecting a supply for the City for the season that runs through September 2016 that is larger than can probably be utilized for those facilities under normal demand conditions. The City therefore has more than adequate supplies this year. Rainfall in the Fresno-Clovis metropolitan area is at 13.83" this year compared to an average rainfall of 10.14" season to date and normal full season of 11.5". Rainfall this year is 136% of average.

Regarding the specific questions the Board is interested in, the City of Clovis offers the following:

1. Since many areas of the State, including the Central Valley, received average or above average precipitation and estimated snowpack runoff will be near normal levels, there is no statewide emergency. The regulations should be either narrowed down to the water suppliers that are significantly still impacted or eliminated entirely. Specifically, Sec. 865. Mandatory Actions by Water Suppliers, should be eliminated. If it is determined that there still is a statewide emergency, provisions of Section 865 should be modified based on current conditions of local water supply, not residential per capita usage from the summer of 2014, which has no bearing on adequacy of supply. Conservation goals should be tiered based on adequacy of supply as determined by the water supplier.

2. The Fresno Irrigation District has already begun making surface water deliveries to both Cities and farmers in the District. Deliveries are scheduled to continue through August which is a normal delivery season. There are not expected to be shortages in the District. Areas that are not experiencing shortages do not need the State to impose restrictions that are unnecessary. If an area is experiencing shortages, it should be up to that urban supplier to enact their water shortage contingency plan as appropriate. The Board should ask all of the water suppliers whether they anticipate shortages to gauge the extent of lingering drought impact.

3. If a supplier has adequate supplies to meet their normal demands the Board should consider that the supplier has no need for mandatory reductions in demands. Water suppliers are required to have Water Shortage Contingency Plans to address water supply shortages. Clovis has purchased capacity in water banking projects for specifically that purpose, to back up normal supplies during shortages. In the current regulations there was no recognition of supplies that were created prior to 2013 that are available for this purpose. The totality of available water supplies and the ability to meet demands should be the primary driver of mandatory conservation regulations.

Continuing to have mandatory conservation requirements under the threat of State penalties is neither justified nor publicly credible in light of the current water supplies. Requiring a 33% reduction in usage when the City has adequate supplies and when rainfall has been at 136% of average will result in public discontent and mistrust of the State's ability to respond appropriately to real emergencies. Thank you for the opportunity to comment.

Sincerely,



Lisa Koehn  
Assistant Public Utilities Director