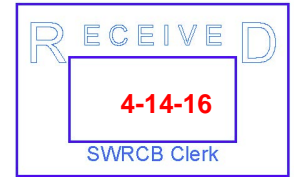


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April 13, 2016

Ms. Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
1001 I Street, 24th Floor
Sacramento, California 95814

Dear Ms. Marcus:

Subject: Comments on Changes to Extended Emergency Water Conservation
Regulation

Thank you for the opportunity to comment on questions proposed by the State Water Resources Control Board (SWRCB) for the Urban Water Conservation public workshop on April 20, 2016. The Los Angeles Department of Water and Power (LADWP) appreciates that the SWRCB is considering taking action to amend the Extended Emergency Water Conservation Regulation (Emergency Regulation) to reflect changes in water supply conditions across the state.

LADWP agrees with the proposal by several agencies to implement a supply-based approach in lieu of the existing conservation mandate. This proposal is in response to the current improved water supply conditions and supports a more localized approach to conservation at the individual supplier or regional level.

However, should SWRCB deem it necessary to continue statewide mandatory conservation measures, LADWP strongly believes the current climate adjustment is not enough to account for watering needs in hotter climates.

To specifically address Question 1: "What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?," LADWP proposes the following:

Climate Adjustment: Increase Adjustment to an Eight Percent Cap

LADWP appreciates SWRCB's inclusion of a climate adjustment to address variation of climates throughout the state. However, the proposed adjustment still presents a significant gap between climate impacts and conservation target reductions.

For example, per the California Irrigation Management Information System (CIMIS) ETo map, a water supplier who is in ETo Zone 18 will lose 32 percent more water from evapotranspiration than the statewide average ETo. However, SWRCB's proposed adjustment would only grant this water supplier a four percent reduction, which is much lower than the reduction required to bridge the deficit from ETo.

To address this significant disparity, LADWP recommends the following restructuring of the adjustment:

Deviation of Urban Water Supplier Service Area's ETo from the Statewide Average ETo	Reduction in Conservation Standard
>30%	8%
15 to 30%	6%
5 to <15%	4%
1 to <5%	2%

This modest increase to the climate adjustment will still set conservation target reductions well below actual deficit ETo. This increase is necessary to strike a closer balance between maintaining strong conservation targets and facilitating adoption of long-term conservation through sustainable landscaping. Modification will help Californians who are eager to transition from "Brown is the new green" to "California-friendly landscaping is the new norm."

LADWP has continued to meet and exceed both our local and statewide water use efficiency mandates. LADWP supports the efforts of SWRCB to involve water suppliers in the Emergency Regulation revision process, and ask that strong consideration be given to our comments above to provide flexibility in meeting these goals.

Ms. Felicia Marcus
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Once again, thank for the opportunity to comment. If you have any questions or require additional information, please contact Ms. Penny M. Falcon, Manager of Conservation Policy, Legislation and Grants, at (213) 367-4647 or penny.falcon@ladwp.com.

Sincerely,



Martin L. Adams
Senior Assistant General Manager – Water System

SM: yrg
By e-mail
c: Ms. Penny M. Falcon