

LAGUNA BEACH COUNTY WATER DISTRICT

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INCORPORATED 1925

April 21, 2015

Ms. Felicia Marcus
State Water Resources Control Board
10011 I Street, 24th Floor
Sacramento, CA 95814

Jessica.bean@waterboards.ca.gov

**SUBJECT: INPUT ON THE UPDATED APPROACH PROPOSED FOR THE DRAFT
REGULATIONS TO IMPLEMENT THE GOVERNOR'S APRIL 1, 2015
EXECUTIVE ORDER**

The Laguna Beach County Water District welcomes the opportunity to provide further input to the State Water Resources Control Board (State Board) regarding the April 17th revisions to the proposed regulatory framework for implementing the Governor's Executive Order B-29-15. We support the Governor's Executive Order in reducing water use due to the escalating drought conditions impacting California. We also understand the short time frame the State Board has had in establishing an equitable formula to monitor the progress in reducing water use.

The proposed tiered method to accomplish the 25% water reduction mandated in the Executive Order is a step in the right direction. The Governor has stated that he recognizes that agencies have taken various levels of conservation efforts that would be taken into consideration in setting targets. By using fairly current water usage information, agencies that have implemented water conservation-based rates and costly conservation programs before the June 2013 date will receive no credit for prior conservation efforts. The drought began more than four years ago, and many agencies took measures to reduce water consumption. Water efficiency programs, such as rebates on removing and replacing turf with water efficient landscaping or artificial turf, rebates on water efficient appliances, rebates on smart irrigation controllers and micro-sprinklers, water conservation rate structures, and free rain barrels have been in place in Southern California for years.

With the implementation of a budget-based tiered structure five years ago and numerous water efficiency programs, our District accomplished the governor's 20% water reduction by 2020 in 2013. Our goal for the 20% reduction by 2020 is 163 GPCD, and in 2013 our GPCD was 161. This year alone we have provided rebates for the removal of 20,627 sq. ft. of residential turf and 48,788 sq. ft. of commercial turf.

Those agencies that have had water conservation programs and tiered rate structures in place before 2013 are being penalized, while agencies that have made little conservation efforts will have an edge in meeting their conservation standard. For example, the city of Chico finally had water meters installed just last year. Our agency was purchasing 4800 acre feet of water in the year 2000. This year we purchased 3650 acre feet, a 33% reduction in water usage since 2000. We realize that it would be difficult to go back that far, but using the year that the drought began to calculate the conservation standard would be a realistic target. By looking back to 2010 to calculate total water saved, the agencies that have practiced conservation will receive credit for those efforts.

Laguna Beach County Water District would like to provide the following comment for your consideration that takes into account prior conservation efforts in order for the regulations to be more equitable for agencies such as ourselves that have already put in place many of the measures that the Governor is mandating in his Executive Order.

1. Consider using the dates June 2010 to February 2015 to determine more accurate water conservation efforts. This is a more equitable approach that does not penalize agencies that have had water conservation measures in place since the drought began, and also does not give unfair advantage to those agencies that have done very little in implementing water conservation.

Sincerely,



Renae M. Hinchey
General Manager
Laguna Beach County Water District