



January 4, 2016

The Honorable Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Proposed Regulatory Framework for Extended Conservation

Honorable Felicia Marcus and Members of the Board,

The City of Glendora appreciates the opportunity to provide comments on the State Water Resources Control Board (Water Board) proposal for the Proposed Regulatory Framework for the Extended Emergency Regulations for Urban Water Conservation released December 21, 2015.

The California State Water Board has requested public comment on the revised restrictions released for public comment on December 21, 2015 which are being considered in order to implement the Governor's Executive Order B-36-15 issued on November 13, 2015.

While we recognize that we are likely to see remnants of the drought's impacts on our water supply linger even should the El Nino materialize, the pressing need and focus should instead be on long-term sustainable water policies. As we have stated in prior communications, the use of mandated emergency restrictions is not the long-term solution to better management and use of this precious resource.

To mandate and impose restrictions on such a geographically diverse State as ours ensures unfairness and a lack of understanding of the impacts these emergency restrictions may be causing upon the environment and economy if you try to extend it. Although the Board's staff has proposed possible modifications, the Governor's goal is still the same as when he declared Executive Order B-29-15 and not reflective of any benefits that have or could be received by the El Nino forecast. As a Water Provider, we have had remarkable assistance and understanding from our customers. We are extremely fearful that maintaining this critical cooperation and understanding is going to be frayed as the public is inundated with stories that the Winter storms have filled reservoirs and yet they see their water rates rise in order to ensure we have funds to pay the set operational costs and needed infrastructure replacement.

We will begin to lose the connection with our customers and clearly the answer cannot be using enforcement against them to keep this State mandated action going. We have seen trees display signs of stress, outdoor landscapes left unattended, conflicts between neighbors as they see what they interpret as an inequity between neighbors' efforts to reduce and those of other communities. Even with your staff's proposed offsets, the most we could see our mandated reduction go down is 2% - 4% or 34% / 32%.

Our City Council has invested over \$5 million into conservation since your restrictions for the mandated reductions went into effect this past May. We have assisted 1,539 residents and businesses with our own rebate program for turf removal, water efficient devices and installation of smart meters. We estimate that between MWD and our own rebate program we have removed over 687,000 square feet of turf at a cost of \$738,262. We have removed turf and re-landscaped every street median with drought tolerant plants and water efficient irrigation, we installed 64,000 square feet of artificial turf for a sports field saving an estimated 1.8 Million gallons annually, and we have held several water conservation seminars to help educate our customers – all since the State imposed restrictions were thrust upon water suppliers in May. This does not contemplate all the successful efforts that were already in place before the State Mandate.

The point being, we have not taken the emergency decree or the task at hand lightly. Yet, to continue the same emergency decree without recognizing the changes that have and most likely will occur as it relates to the drought is just unimaginable to both us and most importantly to our customers. We have seen our revenue drop by nearly 20% in fiscal year 2015 and is on the track to drop by another 20% in fiscal year 2016. This is approximately \$1.5 million each year which is forcing us to seek rate adjustments to recoup the operational and capital improvement costs that would normally have been spread out over the units consumed. As you might imagine customers are now concerned that despite a decrease in use their costs are going to rise.

For these reasons, we ask whether the statewide 25% conservation mark is an accurate reflection of the reduction needed and second, how effective will extending short term conservation efforts impact the long term need for efficient and sustainable water use.

The extension of emergency conservation regulations seems to overlook the long term benefits that have yet to be realized through measures already taken or in process. The rules implemented by the State Water Resources Board that relate to improved water efficiency standards for appliances to be sold within the State and of course the new 2015 Updated Model Water Efficient Landscape Ordinance. The results of these long term actions and the impacts they will have over time should be contemplated as they are likely to offer some relief to the high conservation demands placed on urban water users whom in totality, depending on the source, account for only 11-15% of all water used in the State of California. In the best of scenarios then, a 25% reduction of urban use has a net impact of a 4% statewide reduction.

Ultimately, solving the drought problem in California is not a short term conservation problem. While the current drought will end, in time a new one will surface. Thought should be given to a longer course of sustainable water conservation efforts such as developing a truly comprehensive water management policy which includes better infrastructure, additional reservoir storage to capture and store snowpack melt, and rainfall and developing methods to distribute the runoff to regions with reservoir storage. Capturing and distributing water otherwise destined for the ocean can increase supplies far beyond water conservation efforts which focus on urban use.

With that said, we are pleased that the Governor realizes the need for modifications to the existing mandatory emergency regulations in light of the proposed extended conservation period. While we understand the importance of the careful consideration required of the Water Board to implement any revisions, we believe the extension of the mandatory regulations is a short term band aid on a situation that calls for action that will yield long term sustainable results.

City of Glendora Comments and Suggestions:

- **Climate Adjustment**

The service area evapotranspiration (ET) for the months of July through September throughout California ranges from 3.3 inches to 9.92 inches, a deviation across the state of 67%. Stakeholders proposed a reduction of 0-15% to the conservation standard while Water Board recommends a 0-4% reduction based on the deviation with the statewide average ET of 6.13. Clearly, the service areas with the lowest ET are reaping a substantial benefit as compared to service areas with the highest ET. We suggest raising the maximum adjustment to 8% as follows:

Deviation from Average ET	Reduction in Conservation Standard
>20	8%
10-20%	6%
5-<10%	4%

Climate has a strong influence on water demands, increasing the reduction provides for more of a proportional conservation demand. If the Water Board believes that reducing the conservation standard up to 8% will result in too great of an impact on the statewide saving, it is further suggested that the Water Board consider increasing the conservation standard in service areas with the smallest ET.

- **Growth Adjustment**

The Water Board's proposed calculation for growth adjustment is a long stepped formula which requires information (amount of new residential landscaped area) which is not readily available or easily obtainable. The calculation also relies on residential connections as a determining factor for the growth in population. This method is flawed in that there are communities that have seen a spike in development of condominiums, townhomes and multifamily housing, where four or five connections may supply up to one thousand people. Clearly this does not align with the Water Board's initial methodology of assignment into conservation tiers based on population and a calculated R-GPCD factor.

It is suggested that the Water Board simplify the calculation by determining the increased water use due to growth by multiplying the number of connections added since 2013 with the average volume used per connection in 2013 and taking that growth into consideration for the adjusted conservation requirement.

- **Cap on Adjustment**

While an adjustment cap for individual categories is understood to be a necessary component, there should not be an aggregate cap as to the combined adjustment to any individual water supplier's conservation standard. To limit the total adjustment to just a four percentage point reduction further demonstrates the disproportionate demands placed on some water suppliers. Given the conservative requirements a supplier must meet to justify any reduction across the different credit sources, if the adjustments are warranted they should be credited without reference to a combined cap.

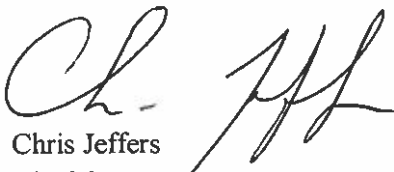
- **Long Term Water Management**

We continue to suggest that the State Water Board be a voice in recognizing that the State needs to take a stronger leadership and action in developing a truly comprehensive water management policy. There are going to be global elements that need to be changed and altered because of the burden on this solution cannot fall primarily upon urban users.

Thank you for your consideration of the above commentary. I can be reached at (626) 914-8201 or cjeffers@ci.glendora.ca.us.

Sincerely,

CITY OF GLENDORA


Chris Jeffers
City Manager

C: Glendora City Council