

April 13, 2015

Ms. Jessica Bean
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Jessica.Bean@waterboards.ca.gov

Subject: Input on Regulatory Concepts to implement the Governors April 1, 2015 Executive Order

The City of Buena Park appreciates the opportunity to provide input to the State Water Resources Control Board (State Board) on implementation of the Governors Executive Order B-29-15. We recognize and sympathize with the State Board that the Residential-GPCD metric is an imperfect approach to monitoring progress in reducing water use and that there is simply not sufficient time to put in place a more appropriate measures such as Efficiency Targets at this time. We must act now to address our current state of water supply emergency due to the intensifying drought conditions impacting California residents and businesses. The City of Buena Park provides the following comments for your consideration that are intended to improve upon the path we are on:

1. Consider apportioning the Water Supplier Reductions to each agency based on averaging the annual R-GPCD per calendar year. For example, Buena Park's R-GPCD per calendar would be:
 - a. 2013 R-GPCD: 108
 - b. 2014 R-GPCD: 102

This methodology best reflects the long-term water usage patterns of the community.

2. Recognition of Indirect Potable Reuse (IPR) – Expanding the use of recycled water is a priority in the state of California as documented in the California Water Plan. Orange County is a leader in recycled water use for both irrigation and dual plumbed buildings (purple pipe), and Indirect Potable Reuse.

The SWRCB should adjust GPCD for agencies receiving IPR through the Ground Water Replenishment System (GWRS) to promote equity and use of recycled water, otherwise IPR projects are unjustly penalized through this unintended disincentive. This sends the wrong message to agencies considering development of IPR.

The methodology for calculating the IPR-Adjusted Production would be as follows:

$$(\text{Total production}) - (\text{IPR Credit}) = \text{IPR-Adjusted Production}$$

This adjustment would be made to the base 2013 monthly data as well as the ongoing monthly reported data.

3. The new monthly reporting requirements for commercial, industrial, institutional, and large landscape institutional is not achievable at this time. Buena Park collects water meter data bi-monthly, attempting to convert this data into monthly reporting information will result in inaccurate data.
4. Consider the following modifications to the percent tier reductions:

Convert the percent reduction to a total Municipal & Industrial acre foot based demand reduction that would include an acre-foot goal rather than R-GPCD. This makes sense since the state is expecting a reduction across all customer classes. Agencies can choose where to emphasize the greatest savings locally (ie more in the landscape and less in business).
5. The State Board, Department of Water Resources (DWR), and the Governor should implement an enhanced, statewide public information campaign using existing outlets to discuss the need to conserve directly with the citizens of the state. We need to tell the residents the expectations now in the event we do not have a good precipitation year. Follow-up needs to occur each month when the snow survey is completed to keep residents informed. People are tired of being asked to conserve. Messages need to reinforce that we have no other options due to the drought we are in.
6. The State Board and Department of Water Resources should assist agencies to develop water budgets or efficiency targets for each consumer. Efficiency targets allow a water agency to inform a customer about what constitutes an efficient level of use. Monitoring actual water use compared to an efficiency standard will allow water agencies to easily identify and focus on customers using water in excess of their efficiency target. Efficiency targets account for previous investments in water use efficiency. It is our strong belief that efficiency targets are a more appropriate mechanism to monitor drought response progress

than the existing R-GPCD method.

7. Compliance and Enforcement – we certainly understand the need for additional water conservation and have the following compliance suggestions:

- a. Compliance should be based on either fully meeting the objectives or agencies should incur a penalty based on how far off they are in meeting the goal.
- b. A penalty per acre-foot not saved rather than \$10,000 per day would be more appropriate.

Again, we appreciate the opportunity to provide input on implementation of the Governors Executive Order B-29-15. Should you have any questions regarding these comments, please contact me at (714) 562-3672.

Sincerely,

A handwritten signature in cursive script that reads "Jim Biery".

Jim Biery

Director of Public Works

City of Buena Park