



April 13, 2015

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
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Subject: Montecito Water District Comment on Executive Order B-29-15

Dear Water Board,

The Montecito Water District (District) is providing comments to the Governor's Executive Order B-29-15 and to the State Board's methodology used in calculating the monthly R-GPCD. First, the District fully supports the Governor's executive order on instituting mandatory statewide water restriction and the State Water Resources Control Board's efforts to document statewide water use.

This unprecedented fourth year of drought in Santa Barbara County, now in its second year of exceptional drought status, caused the District to enact a water rationing ordinance in March 2014 with stiff penalties for water used in excess of a customer's monthly allocation. The District's water shortage emergency ordinance (adopted in February 2014) also included a suspension of new or upsized water service connections and a ban on constructing new water features. Though not initially welcomed by the community, the ordinances provided the understanding and the incentive for customers to achieve an average drop in water use of 47% in comparison to 2013 monthly water use. The District recognized early on that its dependence on unreliable surface water supplies in a drought of this magnitude could only be addressed by monthly water rationing.

The District has been in compliance with the State Board's request for the submittal of monthly water use data to document the level of usage by water agencies. This data was used in the development of a water use reduction plan by the Water Board. The Governor's declaration, in Directive 2 under Save Water, provided a 25% percent of reduction compared to water usage in 2013; with the provision that the percent of reduction consider the "relative per capita water usage". The State Board assigned the District a 35% reduction in water use, which it has been able to achieve since its water rationing ordinance went into effect. The District has a relatively high per capita use, due to its unique community characteristics

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including large properties. However, in comparison to 2013 water usage, customers have dramatically changed outdoor irrigation use to meet the available water supply.

Currently the State Board looks at water production numbers which include unaccounted/non-revenue water. The Water Board may want to consider developing a new water use category that differentiates unaccounted/non-revenue water from actual customer water use. As shown in the following table, the District keeps detailed records of monthly water use by classification.

Class	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Total	% of Total
SFR	184	241	293	395	440	447	497	541	500	484	375	294	4,693	73.9%
MFR	8	8	8	10	11	15	16	18	17	17	13	8	149	2.4%
Ag	13	20	32	47	58	63	70	72	69	70	46	34	593	9.3%
Com	19	19	19	25	25	25	26	29	26	29	22	22	285	4.5%
Ins	15	17	24	43	48	52	69	54	59	50	34	16	481	7.6%
N-P	2	7	14	16	19	15	19	16	14	13	7	5	146	2.3%
<b>Total</b>	<b>241</b>	<b>312</b>	<b>389</b>	<b>537</b>	<b>601</b>	<b>618</b>	<b>698</b>	<b>731</b>	<b>684</b>	<b>663</b>	<b>496</b>	<b>379</b>	<b>6,348</b>	<b>100.0%</b>

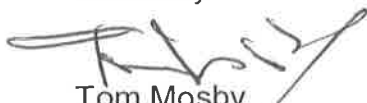
  

Class	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Total	% of Total
SFR	396	258	144	213	262	239	240	239	247	235	170	125	2769	69.9%
MFR	12	10	5	5	9	9	8	9	10	9	6	5	97	2.4%
Ag	61	45	19	27	38	38	39	38	40	38	21	7	410	10.3%
Com	25	20	18	23	19	21	22	24	22	22	17	19	251	6.3%
Ins	26	19	13	24	31	34	42	42	38	31	16	10	327	8.2%
N-P	12	6	7	13	14	12	11	9	11	11	4	0	110	2.8%
<b>Total</b>	<b>531</b>	<b>358</b>	<b>207</b>	<b>306</b>	<b>373</b>	<b>352</b>	<b>362</b>	<b>361</b>	<b>368</b>	<b>346</b>	<b>233</b>	<b>166</b>	<b>3,963</b>	<b>100.0%</b>

In addition to monthly water use by classification, the District also tracks unaccounted/non-revenue water with an annual balance adjustment to correct for the differences in the monthly water production and meter reading schedules. Tracking unaccounted/non-revenue water is an indication of a water agency's ability to efficiently manage water use. Unaccounted/non-revenue water is a significant component of statewide "water use" which can be controlled by implementation of best management practices.

With this drought redefining water supplies and water use in California, methods of managing water and reporting water use must receive a new level of scrutiny. The recent steps taken by the Governor and the State Board are just the beginning of new water management policies that will be needed to face the possible long-term consequences of climate change and its adverse impact on statewide water supplies.

Sincerely



Tom Mosby  
General Manager