



May 1, 2015

CITY COUNCIL
Mark Gran – Mayor
Doug Cox – Mayor Pro-Tem
Geoff Dale – Council Member
Betty Sampson – Council Member
James Tucker – Council Member

CITY CLERK
Debra Jackson

CITY TREASURER
Stacy Cox

Clerk to the Board
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100



Re: 5/5-6/15 BOARD MEETING Item 6. Office of Research, Planning and Performance-Consideration of a proposed Resolution amending and readopting drought-related emergency regulation for urban water conservation to implement Executive Order B-29-15.

Attention: Chair Marcus, Vice Chair Spivy-Weber, and Members Doduc, Moore and D'Adamo:

The City of Imperial is a small community of 17,500 citizens in Imperial County. With a total of 5,062 water accounts, the majority of which are residential, it will be impossible for our community to meet the new tiered mandate of 32% as currently proposed in the drought-related emergency regulations. We have already conserved at a rate of 37% per capita and this additional requirement would create drastic impacts on our community. Additionally our location does not allow for conserved water from urban usage to offset similar use in any other area of the state. Your reconsideration of this mandate is appreciated.

Imperial is a community in the southeastern desert area of the state, an area with some of the highest poverty and unemployment numbers in the nation. Despite this, Imperial makes every effort to be on the cutting edge of community planning and services. Recognizing the benefits of positive environmental leadership, in late 2009 the City Council approved a new tiered rate structure (see attached Water/Sewer Rate Sheet) that would encourage water conservation. This was the first tiered rate structure in the County and was implemented in February 2010. Since this time the City and its residents and businesses have already conserved water at a cumulative rate of 37% per capita (see attached Monthly Water Usage Chart).

After the Governor's drought declaration, the City instituted all required limitations on the use of potable water. Citizens are limited in potable water use for their landscapes, and the city has limited watering of public areas including parks. The most recent housing subdivision has been approved with drought tolerant landscaping as a condition of approval. Some residents who can afford it are replacing their lawns with artificial turf. Can we do more? Very likely, but the impacts of dusty, dried landscapes that have conserved 69% of their water use in a six year period will undoubtedly raise concerns about air quality. Imperial County is already in a non-attainment air basin and has some of the highest rates of asthma for both adults and children in the nation. We have no desire to potentially add to this health risk.



Imperial is also in the service territory for the Imperial Irrigation District, a wholesale water provider with recognized water rights on the Colorado River. Given our location, any water conserved may affect the level of water in the Salton Sea. With less water in storm drains or treated wastewater effluent, there may be less water flowing to the Sea unless other sources are provided. This in turn could create other environmental concerns. However with only 3% of IID water being used by municipal services, and the balance going to our largest economic engine-agriculture, most residents in our region question the benefit of conserving household water. Especially since those conserved precious gallons cannot readily be used by other thirsty areas of our state, except as through the existing Quantification Settlement Agreement.

In short the City of Imperial has already conserved 37% of our water use without any mandate from the State of California. We will continue to do so and can increase our efforts. But our citizens should not be penalized to conserve at a rate of 69%. Hefty increased fines for our region are not an answer. Most of them do not have available funds to pay large fines. A penalty of \$500 to \$10,000 will simply not be paid, as this is 25% of what some households in our area have as total annual income.

The City is requesting reconsideration of our mandated rate of 32% conservation per capita, above and beyond what has already been accomplished through local efforts.

Sincerely,

A handwritten signature in blue ink that reads "Marlene D. Best".

Marlene D. Best
City Manager

WATER RATES

	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14	CURRENT 2014-15
WATER AVAILABILITY CHARGE	\$ 12.49	\$ 12.00	\$ 12.00	\$ 12.00	\$ 12.00	\$ 12.00	\$ 12.00
TIER 1 WATER CONSUMPTION CHARGE	\$ 1.56	\$ 2.10	\$ 2.60	\$ 2.90	\$ 2.95	\$ 2.99	\$ 2.99
TIER 2 WATER CONSERVATION INCENTIVE SURCHARGE	\$ 1.56	\$ 2.31	\$ 2.86	\$ 3.19	\$ 3.24	\$ 3.29	\$ 3.29
TIER 3 WATER CONSERVATION INCENTIVE SURCHARGE	\$ 1.56	\$ 2.70	\$ 3.35	\$ 3.73	\$ 3.79	\$ 3.84	\$ 3.84
MONTHLY FLAT RATE							
0 - 30 HCF OF WATER (PROPOSAL \$2.88)							
31 - 35 HCF OF WATER (PROPOSED \$3.18)							
EXCESS OF 36 HCF OF WATER							

HCF = Hundred Cubic Feet

After Fiscal Year 2011 - 2012 the fiscal years following, the Water Consumption Charge per HCF will be adjusted by the same annual rate of percentage increase as reported in the Los Angeles-Orange-Riverside Counties Consumer Price Index for all items, for the reporting period previous to the beginning of each fiscal year.

SEWER RATES

	2008-09	2009-10*	2010-11	2011-12	2012-13	2013-14	CURRENT 2014-15
SEWER AVAILABILITY CHARGE	\$ 30.40	\$ 45.60	\$ 45.65	\$ 46.98	\$ 47.73	\$ 48.40	\$ 48.40
WATER CONSERVATION SURCHARGE RESIDENTIAL	—	\$ 0.88	\$ 0.88	\$ 0.91	\$ 0.92	\$ 0.93	\$ 0.93
WATER CONSERVATION SURCHARGE COMMERCIAL	—	\$ 2.28	\$ 2.29	\$ 2.36	\$ 2.40	\$ 2.42	\$ 2.42
MONTHLY FLAT RATE							
EXCESS OF 36 HCF OF WATER							
EXCESS OF 21 HCF OF WATER							

HCF = Hundred Cubic Feet

After Fiscal Year 2009 - 2010 the fiscal years following, the Sewer Availability Charge and Conservation Charge will be adjusted by the same annual rate of percentage increase as reported in the Los Angeles-Orange-Riverside Counties Consumer Price Index for all items, for the reporting period previous to the beginning of each fiscal year.

Adopted November 18, 2009 - Resolution 2009-56 (Sewer) and 2009-57 (Water). Calculated as of February 1, 2010 printed bills.

2010 - 2011 Fiscal Year COLA - .1% - Calculated as of August 1, 2010 printed bills.

2011 - 2012 Fiscal Year COLA - 2.9% - Calculated as of August 1, 2011 printed bills.

2012 - 2013 Fiscal Year COLA - 1.6% - Calculated as of August 1, 2012 printed bills.

2013 - 2014 Fiscal Year COLA - 1.4% - Calculated as of August 1, 2013 printed bills.

2014 - 2015 Fiscal Year NO INCREASE

Monthly Water Usage

population	14,758	15,042	15,504	16,148	16,708	17,354	18,022
	2009	2010	2011	2012	2013	2014	2015
total MGM	56.3	50	51.62	52.38	52.58	57.13	51.815
Jan per capita	123	107.226647	107.402044	104.636947	101.515982	106.195213	92.7438328
Jan percent change		-12.9%	0.2%	-2.6%	-3.0%	4.6%	-12.7%
Feb total	49.01	42.65	47.25	51.41	50.72	51	52.756
Feb per capita	118.603953	101.26408	108.842879	113.702714	108.416841	104.95776	104.545431
Feb percent change		-14.6%	7.5%	4.5%	-4.6%	-3.2%	-0.4%
Mar total	67.52	57.02	60.08	61.53	69.12	67.84	63.866
Mar per capita	147.585345	122.281268	125.004161	122.915451	133.44969	126.10333	114.313956
Mar percent change		-17.1%	2.2%	-1.7%	8.6%	-5.5%	-9.3%
Apr total	77.18	69.54	70.66	75.59	77.8	79.26	
Apr per capita	174.323531	154.101848	151.917785	156.035835	155.215067	152.24226	
Apr percent change		-11.6%	-1.4%	2.7%	-0.5%	-1.9%	
May total	92.65	87.53	84.19	92.42	94.47	92.98	
May per capita	202.514547	187.710968	175.168115	184.622883	182.392827	172.834428	
May percent change		-7.3%	-6.7%	5.4%	-1.2%	-5.2%	
Jun total	93.39	95.3	95.79	99.11	100.83	100.59	
Jun per capita	210.936441	211.186456	205.946852	204.586739	201.16112	193.21283	
Jun percent change		0.1%	-2.5%	-0.7%	-1.7%	-4.0%	
Jul total	106.44	103.08	105.86	103.71	100.34	105.111	
Jul per capita	232.656755	221.058456	220.255335	207.176361	193.726011	195.383949	
Jul percent change		-5.0%	-0.4%	-5.9%	-6.5%	1%	
Aug total	106.49	99.12	102.87	95.29	93.35	88.136	
Aug per capita	232.766045	212.566105	214.034255	190.356141	180.230448	163.830234	
Aug percent change		-8.7%	0.7%	-11.1%	-5.3%		
Sep total	94.87	93.35	90.57	91.15	82.1	81.265	
Sep per capita	214.279261	206.865222	194.723942	188.155396	163.793791	156.093455	
Sep percent change		-3.5%	-5.9%	-3.4%	-12.9%		
Oct total	82.03	69.19	77.77	81.41	80.41	75.167	
Oct per capita	179.30133	148.380234	161.81048	162.628749	155.247245	139.72301	
Oct percent change		-17.2%	9.1%	0.5%	-4.5%		
Nov total	69.42	63.87	62.64	69.27	65.64	65.38	
Nov per capita	156.796314	141.53703	134.674923	142.989844	130.955231	125.58	
Nov percent change		-9.7%	-4.8%	6.2%	-8.4%		
Dec total	53.89	51.98	52.41	56.42	56.62	50.907	
Dec per capita	117.792865	111.472822	109.045741	112.707456	109.315993	94.6276859	
Dec percent change		-5.4%	-2.2%	3.4%	-3.0%		

annual average water usage per person per day

	178.66	162.99	161.56	159.93	153.62	146.42321
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percentage change per year

		-9%	-1%	-1%	-4%	-5%
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percent change from 212 gpcd baseline

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MGM = Millions of Gallons per Month