



Long Beach Water Department

The Standard in Water Conservation &
Environmental Stewardship

(5/18/16) Board Meeting- Item 10
Conservation Extended Emergency Reg
Deadline: 5/16/16 by 12:00 noon



Sent via email: commentletters@waterboards.ca.gov

May 13, 2016

The Honorable Felicia Marcus, Chair
Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

**RE: Long Beach Water Department Comment Letter - Conservation Extended
Emergency Regulation (released May 9, 2016)**

Dear Chair Marcus and esteemed Members of the State Water Resources Control Board:

The Long Beach Water Department (LBWD) appreciates the opportunity to comment on the proposed emergency regulation extension for urban water conservation. LBWD serves the city of Long Beach, the seventh most populous city in California, covering over 50 square miles in Los Angeles County and representing nearly half a million residents. LBWD and our customers have long made "conservation a way of life." Our customers consistently lead the way in efficient water use practices, achieving an impressive average of 61 residential gallons per capita per day (R-GCPD) over the last 12 months (May 2015 through April 2016). The State Water Board's recognition of changed hydrologic conditions and the value of a supply reliability-based approach to transition away from the previous strictly demand reduction-based approach is both appropriate and equitable.

LBWD would respectfully recommend the following technical changes:

1. Provide an additional week for compliance by amending Sec. 864.5(a)(2) and 864.5(a)(3) to June 22, and Sec. 864.5(b)(4)(e) to June 15. This allows both wholesale and retail agencies additional time to ensure that calculations are as accurate as possible.
2. Amend 864.5(a)(4)(b) to calculate the conservation standard based on the first year, rather than the third year to reflect immediate emergency conditions rather than possible "worst case" conditions associated with the third year hydrology; this would also support and help establish the California "conservation as a way of life" ethic.

3. Amend 864.5(a)(4)(b)92) to calculate potable water demand based on an average of three years including 2015, which is expected to better reflect lower water user demand in the face of continued drought conditions as would be communicated by water suppliers, the state and the media.

LBWD is not opposed to a conservation floor. Rather than an arbitrary target, LBWD would suggest anchoring that 'floor' to each agency's trend needed to meet their existing state-mandated 20 x 2020 target including a weather-normalization option, consistent with SB x 7 7.

LBWD is deeply committed to continuing the promotion of efficient, climate-appropriate water use and implement the local supply and demand management programs. LBWD strongly believes that Long Beach customers are likely to maintain lower water demand levels in coming months, even if self-certification demonstrates adequate water supply reliability in the face of the continued drought. As a recent example of customer commitment to conservation, in April 2016, with a conservation goal of nine percent, LBWD customers conserved an impressive 16.6 percent as compared to April 2013.

Finally, LBWD commends the State Board for strong leadership on this critical issue and for taking a comprehensive water perspective on long term conservation, moving forward. One-size-fits-all solutions for California are always difficult, creating many unintended consequences given the vast diversity across the state – whether that diversity in GPCD, climate and hydrology, populations, or even local needs and resources. Allowing water suppliers the flexibility they need to best serve their local communities and also meet the directives and goals of the Governor is a sound approach to the complicated challenge of securing reliable water supplies. LBWD looks forward to working together to create a new normal for the continued health and vitality of our future California.

Respectfully,



Christopher J. Garner
General Manager