

# PEPPERDINE UNIVERSITY

CENTER FOR SUSTAINABILITY

Submitted via email to [jessica.bean@waterboards.ca.gov](mailto:jessica.bean@waterboards.ca.gov)

April 13, 2015

Thomas Howard  
Executive Director  
State Water Resources Control Board  
1001 I Street  
Sacramento, California 95814

**RE: Pepperdine University's Comments on the State Water Resources Control Board's Mandatory Conservation Proposed Regulatory Framework**

Dear Executive Director Howard:

Pepperdine University applauds the State's strategic response to this historic drought and the need for measurable actions as part of a proposed regulatory framework for drought response. Water availability is one of the most significant environmental concerns California, and in particular Southern California, faces.

Pepperdine's water conservation practices date back to 1972 when we first implemented a water-recycling program, which today reuses virtually all potable water from the Malibu campus. Through the years we have supplemented our comprehensive program with additional measures including a campus-wide water monitoring program, low flow fixtures, a pool cover, and native vegetation. Upon issuance of Governor Brown's original Executive Orders in 2014, Pepperdine University took additional action including lowering the temperature of the pool to reduce evaporation, replacing potable spray-down of campus hardscapes, turning off campus water features, and implementing a behavioral campaign to encourage a collective conservation effort. And upon issuance of Governor Brown's third Executive Order, B-29-15, we immediately convened to look for further opportunities for conservation.

It is important at the earliest stages of this emergency regulatory framework to acknowledge and appropriately credit early action of water supplier customers prior to 2013. These customers, including Pepperdine, have collectively saved the State billions of gallons of water over time. Given our significant investment and good stewardship in water conservation to date, and specifically that approximately 97% of our irrigated areas use reclaimed water, conserving an additional 25% or 35% will be unachievable or impractical. Nevertheless, we will stretch to find as much additional conservation as possible.

## Early Action

Executive Order B-29-15 and the corresponding mandatory conservation proposed regulatory framework (the "framework") from the SWRCB seek to achieve an aggregate

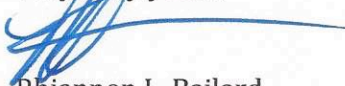
statewide 25% reduction in potable urban water use between June 2015 and February 2016. The framework places the responsibility for the aggregate 25% reduction on the State's water suppliers who will, in turn, mandate conservation through their customers. The means by which the water suppliers will achieve the reduction in their own region is not specified and presumably is left to each supplier to determine. The framework seeks to recognize conservation achieved by individual communities through its tiered R-GPD conservation standards and states an intent 'to equitably and effectively' achieve the reduction; however, it does not currently provide a means to acknowledge early action prior to 2013. Since 1972, Pepperdine has made a significant investment in water conservation resulting in the cumulative savings of billions of gallons. As a customer who has already achieved significant water conservation that predates the 2013 baseline, we are concerned that the proposed framework does not expressly recognize early action. Much like the early action credits provided for in Section 95990 of the California Air Resources Board's Cap-and-Trade Regulation, **we encourage the SWRCB take water conservation efforts prior to 2013 into account when crafting the regulations in the interest of equity and to continue to stimulate proactive conservation.** The State should acknowledge and account for those users who have conserved the most for the longest.

#### Reclaimed Water Users

The SWRCB's proposed regulatory framework appropriately focuses on reducing potable water consumption but does not currently recognize the use of reclaimed or recycled water by either the water supplier or water users. Reclaimed water is a powerful water conservation tool. Each gallon of reclaimed water that is used is arguably a gallon of potable water that is conserved. Indeed, reclaimed water can often reduce the need for, or even completely replace, potable supplies in many instances. **We ask that the SWRCB framework credit recycled water that replaces the demand for potable supplies towards water reduction targets.** Further, the State should incentivize and prioritize significant investment in reclaimed water retention and reuse.

Once again, Pepperdine University applauds the leadership of Governor Brown and the SWRCB on this historic drought. Inaction is no longer a viable option, and we appreciate proactive efforts to achieve this necessary conservation. To that end, we will continue to work closely with our potable and reclaimed water suppliers' (Los Angeles County Waterworks District 29 and Las Virgenes Municipal Water District) leadership on this critical issue. We are happy to provide any further information to the SWRCB as you finalize and implement these important regulations. Thank you for your time in considering our comments.

Very truly yours,



Rhiannon L. Bailard  
Associate Vice President

Cc: Andrew K. Benton, President, Pepperdine  
Gary A. Hanson, Executive Vice President, Pepperdine  
Phil E. Phillips, Vice President for Administration, Pepperdine  
Rick M. Gibson, Vice President for Public Affairs & Church Relations, Pepperdine  
Mark Pestrella, Chief Deputy Director, Los Angeles County Public Works  
Dave Pederson, General Manager, Las Virgenes Municipal Water District