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Richard W. Hansen, P.E.

April 13, 2015

State Water Resources Control Board

Attn: Jessica Bean

P.O. Box 100

Sacramento, CA 95812-0100

Dear Ms. Bean:

The Three Valleys Municipal Water District (TVMWD) commends Governor Jerry Brown's call for statewide urban water use reductions of 25% in an effort to preserve California's precious water resources. TVMWD is a direct wholesale member agency of the Metropolitan Water District of Southern California and has worked endlessly with its retail customers to promote a variety of conservation programs and measures for several years.

The State Water Resources Control Board (SWRCB) chose to use the Governor's Executive Order issued on April 1 to mandate restrictions to achieve the 25% reduction in potable urban water use through February 2016. The SWRCB was directed to consider relative residential gallons per customer per day (R-GPCD) to achieve the 25% reduction. In doing so, the single month of September 2014 has been proposed as the basis for R-GPCD.

For compliance, water use is to be compared for a nine-month period from June 2013 to February 2014, yet flexibility is proposed in how reductions are accomplished based on the level of conservation already achieved by water agencies across the state. However, there is no consistency in the R-GPCD comparisons.

Our concern is that the baseline chosen by the State does *not* acknowledge previous conservation efforts, nor does it appear to give credit for actions and reductions already accomplished through the last drought period or against the earlier 20% by 2020 mandate. If an agency has already achieved the original 20% reduction goal mandated in 2009, then they need to be recognized for their water savings to date. To mandate an additional 25% among its customer base, the savings achieved by looking at the average water use over the recent two-year period should be recognized. Another concern is that the historically less proactive agencies will not face the same issue of conservation hardening since *less* of a cutback in water usage will be required - in comparison to those who have been conserving more aggressively to date.

We would request consideration of the following points:

- There should be no reduction required for agencies with less than 55 R-GPCD.
- The conservation standard should utilize an equitable sliding scale based on R-GPCD. As currently proposed, agencies as little as one gallon into the next range will be required to cut significantly more R-GPCD than those in a lower range based on the conservation standard applied. The disparity can be significant.
- The GPCD should be based on a 12-month average, not a single month (September 2014). This will better reflect a full cycle of weather patterns and corresponding water use that is more balanced throughout the year.
- Likewise, the compliance assessment period should be reasonably based over a 12-month period rather than a nine-month period (June-February).

Thank you for providing us with the opportunity to comment on the proposed regulatory framework. If you have any questions regarding our feedback and comments, please contact me at 909-621-5568.

Sincerely,



Richard Hansen, P.E.

General Manager

Three Valleys Municipal Water District