

LAGUNA BEACH COUNTY WATER DISTRICT

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INCORPORATED 1925

April 13, 2015

Ms. Jessica Bean
State Water Resources Control Board
10011 I Street, 24th Floor
Sacramento, CA 95814

Jessica.bean@waterboards.ca.gov

SUBJECT: INPUT ON REGULATORY CONCEPTS TO IMPLEMENT THE GOVERNOR'S APRIL 1, 2015 EXECUTIVE ORDER

The Laguna Beach County Water District welcomes the opportunity to provide input to the State Water Resources Control Board (State Board) regarding the implementation of the Governor's Executive Order B-29-15. We support the Governor's Executive Order in reducing water use due to the escalating drought conditions impacting California. We also understand that there was not adequate time to research and put in place a more equitable formula to monitoring progress in reducing water use, taking into consideration that many agencies have already implemented water efficiency measures, such as a water conservation rate structure, rebates on removing and replacing turf with water efficient landscaping or artificial turf, rebates on water efficient appliances, rebates on smart irrigation controllers and micro-sprinklers.

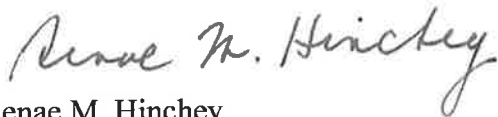
As an example, Laguna Beach County Water District over the past nine months has had a 26% reduction in water usage for its residential customers. The September 2014 month that was used for the calculation of R-GPCD was our hottest month in 2014 with the highest usage for that year. We implemented a budget-based tiered structure five years ago and accomplished the governor's 20% water reduction by 2020, which we met in 2013 due to implementing a tiered rate structure and rebate programs. Our goal for 2020 is 163 GPCD and in 2013 our GPCD was 161. This year alone we have provided rebates for the removal of 20,627 sq. ft. of residential turf and 48,788 sq. ft. of commercial turf.

From information from a conference call that Townsend Public Affairs participated in with the State Board, the Department of Water Resources, and other relevant agencies regarding the Executive Order, it was discussed that the Governor recognized that various agencies have taken different levels of effort, and the most fair and effective method would be to take into account those who have been conserving longer will have lower targets than those that have just began conservation or use more. Using the September 2014 GPCD does not take into account prior conservation efforts, including conservation-based rates and rebates, which has taken place for the past few years of the drought.

Laguna Beach County Water District would like to provide the following comment for your consideration that is intended to make the regulations more equitable by taking into account prior conservation efforts for agencies such as ourselves that have already put in place many of the measures that the Governor is mandating in his Executive Order.

1. For agencies that have implemented a conservation-based rate structure (water budget-based structures) or water conservation measures, it would be more equitable to apportion water reductions by:
 - a. Going back to the date an agency implemented its conservation-based rate structure to account for the percentage of water reduction that has taken place prior to the September 2014 date, or
 - b. Considering using the September GPCD from the year prior to the beginning of the drought to more equitably measure conservation efforts many agencies have achieved since the drought began.

Sincerely,



Renae M. Hinchey
General Manager
Laguna Beach County Water District