



# PALMDALE WATER DISTRICT

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## Board of Directors

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April 21, 2015

State Water Resource Control Board  
ATTN: Felicia Marcus, Board Chair  
Tom Howard, Executive Director  
1001 I Street  
Sacramento, CA 95814

**RE: MANDATORY CONSERVATION REGULATORY FRAMEWORK –  
APRIL 18, 2015 DRAFT**

**VIA EMAIL: [jessica.bean@waterboards.ca.gov](mailto:jessica.bean@waterboards.ca.gov)**

Dear State Water Resources Control Board Members:

Palmdale Water District (District) understands the impacts of the current drought and supports the statewide approach by Governor Brown to address it. Your responsibility to craft mandatory conservation regulations implementing the Governor's Order fairly throughout the State is a tough and thankless duty. The District applauds your effort and changes that are incorporated into the April 18<sup>th</sup> draft and appreciates the opportunity to comment.

The District's main concern is that an equitable method is established to meet the 25% reduction requirement. The development of a larger number of tiers to set conservation standards for public water purveyors is an improvement over the first draft. However, the standards set residential gallons-per-capita-per-day (R-GPCD) that do not incorporate the vast differences in climates throughout the State.

The District suggests using a uniform conservation standard as a percentage reduction from each agency's 20X2020 baseline. The Department of Water Resources has each agency's baseline information as part of the submitted 2010 Urban Water Management Plans. This information can be used to calculate a conservation standard that achieves the Governor's Order.

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This method has a few advantages. First, a uniform goal (be it 20%, 25%, 30%, etc. from baseline) would simplify and assist in statewide messaging. Second, it accounts for the various climates throughout California. Thirdly, it acknowledges the progress on conservation made already toward the 20X2020 requirement, not just changes in the last two years. In the District's case, our customers have already cut their water use by 30% on a 12-month running average from the baseline and, thus, have exceeded the 20X2020 requirement in both time and amount. The draft regulation goal for the District (as part of Tier 8) is equal to a 45% reduction from the 20X2020 baseline R-GPCD.

As background information, the District serves approximately 115,000 people through 27,000 connections in the high desert area of northern Los Angeles County. Our water sources are the State Water Project, local groundwater (under adjudication), and local surface water. The District's water rate structure is a true water budget structure with monthly allocation determined by the number of residents, landscaped area, and weather. There are six cost-based tiers with the first tier for single family residential equaling the indoor allocation. The remaining tiers are available for drought surcharges if needed. The District also has existing rebate programs for appliances and turf removal, active community outreach, and, as stated above, our customers have cut their water usage 30% from the 20X2020 baseline.

Please feel free to contact me at 661-456-1017 or [dlaMOREAUX@palmdalewater.org](mailto:dlaMOREAUX@palmdalewater.org) if you have any questions.

Very truly yours,



DENNIS D. LaMOREAUX,  
General Manager

DDL/dd

cc: PWD Board of Directors