



RIO LINDA / ELVERTA COMMUNITY WATER DISTRICT

P.O. BOX 400 • 730 L STREET
RIO LINDA, CALIFORNIA 95673
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April 22, 2015

Jessica Bean
Water Boards

Re: Proposed Framework for Mandatory Conservation measures.

Dear Ms. Bean,

The Rio Linda/Elverta Community Water District appreciates the opportunity to comments on the Board's proposed regulatory framework for implementing the statewide 25% reduction mandated by the Governor's April 1, 2015 Executive Order.

I have two comments. My first comment is on using the R-GPCD as the indicator of water used in a residence. I have attached an example of what happens when using the R-GPCD which includes unaccounted for water used in fires, street sweeping, main line maintenance etc. versus the actual usage taken from water meters. As you can see the actual residential usage is less than the R-GPCD. This is because the unaccounted for water used by others is included in the R-GPCD.

I would like to Board to consider allowing a provision for Districts that are fully metered to use actual meter readings instead of the R-GPCD. For the following reasons:

It is an actual measure of the water used by residents,

The residents can individually be held accountable for water used over the State mandated amount.

These numbers are already reported to the State on a monthly basis in our annual reports.

My second comment is regarding properties with mixed use. There is currently no provision for determining how to calculate water usage for a property that has for example a restaurant downstairs and a residence above or a strawberry farm on the same parcel as a home. We bill by meter size not by type of use. Some guidance on how to determine the portion of water that is residential would be appreciated by many.

DIRECTORS:

Duane Anderson, President
John Ridilla, Vice President
Brent Dills, Director
Paul Green, Director
Mary Harris, Director

General Manager / Secretary:
Mary Henrici
MHenrici@rlecwd.com

Thank you for your consideration of this comment,

Sincerely,

Mary Henrici

Mary Henrici
General Manager
Rio Linda, Elverta CWD

Current SWRCB Formula

GPCD Using actual billed Residential usage from Meters for period
Using actual 2014 Single Family and Multi Family Residential (apartments)

| Period | 2013 same period | | | RGPCD | Billed Res Usage | Population | Days | RGPCD | Actual 2014 % Res. for period |
|----------------|------------------|---------------|------------|--------|------------------|------------|------|-----------------------|-------------------------------------|
| | Total Production | % Residential | Population | | | | | | |
| January 2014 | 43,223,720 | 92 | 10936 | 1.17 | 71,625,488 | 10936 | 61 | 107.37 | 83% |
| February 2014 | 31,593,408 | 92 | 10936 | 94.9 | | | | | |
| March 2014 | 36,983,432 | 91 | 10936 | 99.2 | 59,370,256 | 10936 | 60 | 90.48 | 92% |
| April 2014 | 45,031,976 | 91 | 10936 | 124 | | | | | |
| May 2014 | 82,402,968 | 86 | 10936 | 209 | 89,379,268 | 10936 | 61 | 133.98 | 89% |
| June 2014 | 109,268,824 | 86 | 10936 | 286 | | | | | |
| July 2014 | 115,965,570 | 86 | 10936 | 294 | 172,672,808 | 10936 | 61 | 258.84 | 87% |
| August 2014 | 101,389,176 | 86 | 10936 | 257 | | | | | |
| September 2014 | 85,940,496 | 85 | 10936 | 225.02 | 154,004,972 | 10936 | 62 | 227.14 | 86% |
| October 2014 | 67,003,567 | 85 | 10936 | 169.77 | | | | | |
| November 2014 | 42,000,000 | 91 | 10936 | 108 | 112,546,324 | 10936 | 61 | 168.71 | 86% |
| December 2014 | 37,417,704 | 91 | 10936 | 101.2 | | | | | |
| | | | | | | | | Running Average RGPCD | 145.03 |

| Period | 2014 same period | | | RGPCD | Billed Res Usage | Population | Days | RGPCD | Actual 2015 % Res. for period |
|---------------|------------------|---------------|------------|-------|------------------|------------|------|-----------------------|-------------------------------------|
| | Total Production | % Residential | Population | | | | | | |
| January 2015 | 36,479,536 | 83 | 10936 | 89.31 | 60,652,328 | 10936 | 61 | 90.92 | 92% |
| February 2015 | 34,130,442 | 83 | 10936 | 92.51 | | | | | |
| March 2015 | 42,007,355 | 92 | 10936 | 114 | 54,349,680 | 10936 | 60 | 82.83 | 89% |
| | | | | | | | | Running Average RGPCD | 145.03 |