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April 13, 2015

Jeanie Townsend, Clerk of the Board and
Tom Howard, Executive Director
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100

Subject: Proposed Adoption of New Emergency Drought Regulations

Dear Ms. Townsend and Mr. Howard:

Thank you for the opportunity to comment on the new mandatory emergency drought regulations. Clearly we are living in a historic time in the water industry in California that calls for innovative, effective, improved water management. The Mojave Water Agency applauds Governor Brown's leadership in this drought, and sincerely appreciates the opportunity to partner with the State of California to ensure water sustainability, as well as offer some alternatives for your consideration.

The Mojave Water Agency (MWA) is a water wholesaler located in the Southern California region. We serve a population of approximately 450,000 in an area that encompasses some 4,900 square miles in the arid Mojave Desert. In our territory we serve six cities and 10 urban water suppliers. We remain committed to water conservation and have a unique understanding of the challenges and complexities associated with managing water under demanding and sometimes arduous weather conditions. Even in wet years we receive less than 5 inches of water per year. We heeded the call given by Governor Schwarzenegger in 2008 with his 20 x 2020 mandate and have taken serious steps to meet that goal. We are well aware that water usage efficiencies can still be increased and are continuing; through multiple educational and incentive programs, to achieve those goals.

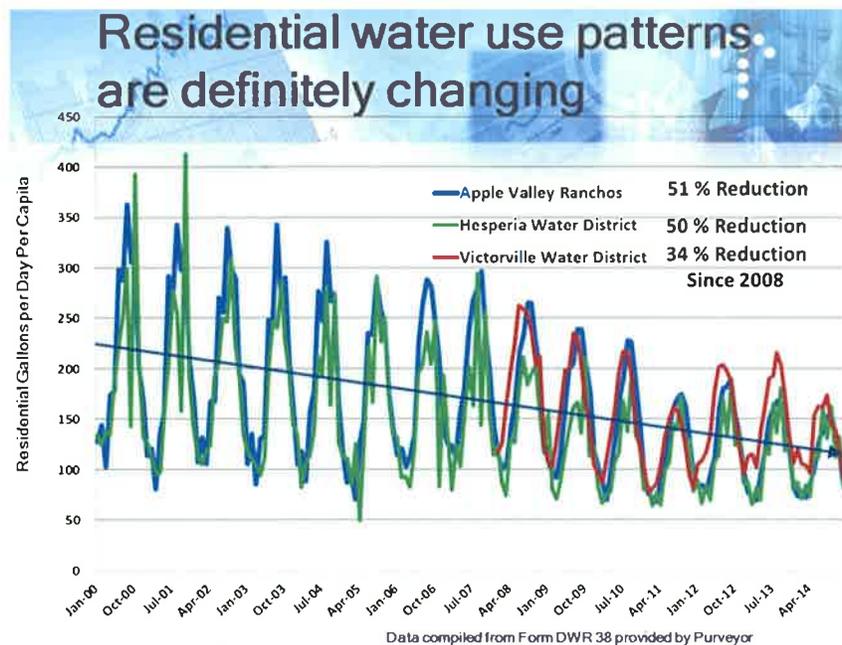
We appreciate and support the state's position to reduce and conserve our most precious resource and look forward to continuing our partnership with you. As we have worked with our cities and urban water suppliers to achieve statewide conservation goals, we have developed long-term water conservation data that demonstrated our region's progress toward these goals and request that you consider the following:

1. We support SWQCB's efforts to expand reporting requirements.

We support adding more reporting requirements to the monthly report. For years, MWA has used DWR Form 38 as a resource to monitor performance of regional conservation programs and have found it useful to evaluate multiyear trends in per capita water usage. Much of the new data that is proposed to be collected by the State Board is part of this form. The new requirements in data collection will help many of our purveyors understand their usage and help them to calculate their R-GPCD better.

2. We encourage SWRQB staff to coordinate with DWR to incorporate all historic information collected on DWR Form 38 and provide historical "context" for new SWRQB conservation related rule making.

Many of our communities have shown a dramatic decrease in their overall usage over the past 15 years and we would like you to look at the past successes that many purveyors have had. This drought is four years old but many areas have taken this seriously before that time.



3. Many communities have heeded the call for conservation set out in 2008 through SB x 7-7. Consideration should be given to those communities that have already stepped up.

We are asking that the Board consider adopting a variance in the proposed regulatory tiers when a purveyor has already reached the state mandated 20 x 2020 goal. This goal has been a major policy driver in our area and has resulted in a major shift in water usage habits. It is our hope that this issue can be addressed by allowing purveyors that

have achieved this goal to be “bumped” up a tier, making their target efficiency more realistic and recognizing their prior efforts.

4. The proposed regulations and tiers of the compliance goals do not take into account variances in geography.

The proposed tiers do not take into consideration the vast differences in our state. The climate of inland areas vs. coastal areas will severely affect how the tiers are implemented. The State's own conservation reporting website states that we should be cautioned when comparing agency-to-agency but essentially that is what the proposed regulatory Framework tiers does. We believe this results in an inequitable distribution in mandated demand reduction.

Office of Governor Edmund G. Brown Jr.
Visit his Website

Board Chair Felicia Marcus
View her Bio

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Conservation Reporting

Quick Links: [Monthly Urban Water Supplier Report Data](#) | [Water Supply Tools](#) | [Who's Hot!](#) | [Helpful Links](#)

Monthly Urban Water Supplier Report Data

IMPORTANT NOTE!

It is not appropriate to use Residential Gallons Per Capita Day (R-GPCD) water use data for comparisons across water suppliers, unless all relevant factors are accounted for. Factors that can affect per capita water include:

- **Rainfall, temperature and evaporation rates** – Precipitation and temperature varies widely across the state. Areas with high temperature and low rainfall need to use more water to maintain outdoor landscaping. Even within the same hydrologic region or the same water supply district these factors can vary considerably, having a significant effect on the amount of water needed to maintain landscapes.
- **Population growth** – As communities grow, new residential dwellings are constructed with more efficient plumbing fixtures, which causes interior water use to decline per person as compared to water use in older communities. Population growth also increases overall demand.
- **Population density** – highly urbanized areas with high population densities use less water per person than do more rural or suburban areas since high density dwellings tend to have shared outdoor spaces and there is less landscaped area per person that needs to be irrigated.
- **Socio-economic measures such as lot size and income** – Areas with higher incomes generally use more water than areas with low incomes. Larger landscaped residential lots that require more water are often associated with more affluent communities. Additionally, higher income households may be less sensitive to the cost of water, since it represents a smaller portion of household income.
- **Water prices** – Water prices can influence demand by providing a monetary incentive for customers to conserve water. Rate structures have been established in many districts to incentivize water conservation, but the effectiveness of these rate structures to deter excessive use and customers sensitivity to water prices vary.

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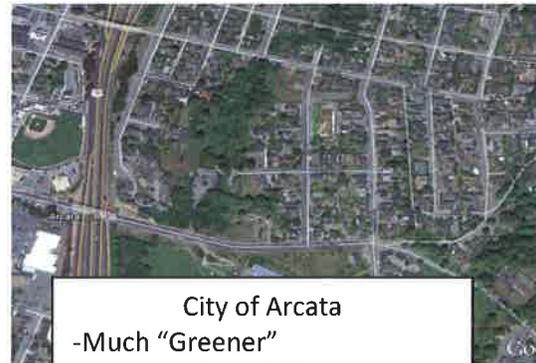
Water Quality
Performance Report

WATER RIGHTS RESOURCES

Here are two differing communities and the reported water usage for each:



The Town of Yucca Valley
-Very little grass and plants
-This is an 85 R-GPCD community



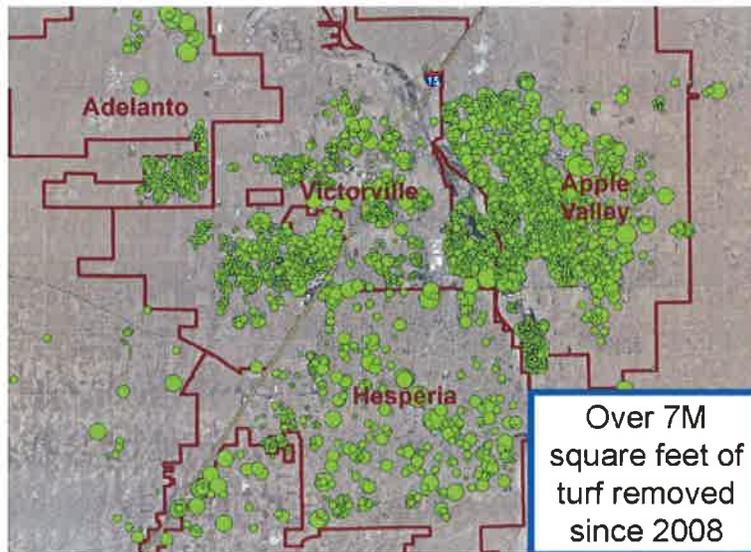
City of Arcata
-Much “Greener”
-This is a 50 R-GPCD community

(Intent is not to compare communities but to show differing climates and geographic areas)

5. Prioritize state investments in available funding for turf removal in areas that already have established programs so that there is the greatest chance of realizing immediate impacts to achieve the 50M square foot turf removal and the 25% per capita reduction goals identified in the Executive Order.

We have invested over \$4.2 million since 2008 in our Water Conservation Incentive Program (WCIP) for households to help with conservation. We have done this with rebate programs and education and outreach programs. We currently have a successful Cash for Grass program that has removed over 7.4 million sq. ft. of turf. In addition a large scale Cash for Grass program was recently launched with pending applications totaling 912,000 sq. ft. to be removed from homes, golf courses, schools, and HOA's. We also offer toilet and weather based controller programs. Since the year 2008 we have reduced the demand on our system by over 1,600 acre feet of water per year. Additional investments in capital for State funding sources would boost the effectiveness of these existing programs in a way that precisely targets goals established in the Executive Order.

Here is an example of how our community has embraced the residential Cash for Grass program. This is a weighted map of all of our projects:



6. We suggest providing water purveyors an alternate pathway to meet established state conservation goals that encourages water reductions in commercial or large scale settings. Shifting performance metrics to also include gross GPCD allows agencies to capture water use reductions beyond those in the current methodology which are limited to residential usage.

The governor has asked for an across the board 25% reduction in the state's water usage. We suggest adding the ability for water purveyors to capitalize on water savings

in commercial areas. We feel the state can get the best results going after the larger users. As residents we all need to participate in achieving the state's goals, but there has been little direction with regards to requiring large commercial users to reduce their water use. Gross GPCD performance metrics would capture potential savings from golf courses, HOA's, cemeteries, schools, and parks and the 25% will be far easier to achieve.

Closing

In summary, we appreciate the opportunity to comment on the State Board's proposed regulatory framework for achieving the Governor's Executive Order for a 25% reduction in potable water. The Mojave Water Agency and the community we serve has and remains committed to implementing practices that allow us to use our limited and precious water supplies in the most efficient manner possible. We look forward to continuing the dialogue with the State Board to find the most efficient and equitable pathway to achieve the mutual goals of our community and the State of California.

Sincerely,

A handwritten signature in black ink, appearing to read 'KR', is positioned above the typed name.

Kirby Brill
General Manager