



ROWLAND WATER DISTRICT

BOARD OF DIRECTORS

Szu Pei Lu-Yang
President

John E. Bellah
Director

Anthony J. Lima
Director

Robert W. Lewis
Vice President

Teresa P. Rios
Director

Thomas L. Coleman
General Manager

David Warren
Director of Operations

Rosemarie Perea
Director of Administrative Svcs.

April 13, 2015

Ms. Jessica Bean
State Water Resources Control Board
P. O. Box 100
Sacramento, CA 95812-0100

e-mail transmission:
Jessica.Bean@waterboards.ca.gov

Re: Comments on Draft Regulatory Framework to Implement 25% Water Conservation

Dear Ms. Bean:

For over 60 years, Rowland Water District (RWD) has been committed to providing high quality water to its customers in southeastern Los Angeles County. Today, the District serves approximately 62,000 people in its 17.2 square mile service area. RWD's five-member, publicly elected Board of Directors represents a diverse community of residential, commercial and light industrial customers.

Since 2009, RWD has invested more than \$20 million in the expansion of its recycled water system, which has resulted in the decrease of potable water usage from 14,000 a.f. per year to under 12,000 a.f. per year. This is approximately a 20% reduction in potable water usage. In addition to this investment in its infrastructure, the District has also implemented tiered-rate conservation pricing. The District's conscientious conservation efforts have resulted in a 94.5 gallons per day, per person consumption average.

We appreciate and support the state's efforts to eliminate water waste and stretch our precious resources. However, one thing must be understood and agreed upon: water use and demands do not fit into a "one size fits all" category. For example, although per capita water use generally provides a solid comparison between water agencies, it is only as good as the information used to generate the number. Your Board requires water suppliers to provide this information on a monthly basis, however, RWD bills both monthly and bi-monthly. Therefore, RWD's per capita numbers will vary greatly month to month dependent upon the estimated number of residential customers included in a particular billing cycle and month. More importantly, the reported per capita numbers do not reflect production and use in the same month.

Ms. Jessica Bean
Page Two

We, therefore, suggest that the Board consider the following:

1. Per capita reporting should be based upon a 12-month period, not a single month.
2. The compliance period should also be based upon a 12-month period versus the proposed nine-month period.
3. The compliance period makes no allowance for weather conditions, which will dramatically alter water-use patterns (e.g., weather in the 2013 base period compared to the present use period).
4. Should an agency fail to achieve the required target reduction number, yet has implemented every tool available to encourage conservation, compliance should be granted.
5. Be prepared to make allowances for how information is reported as customer sector information (e.g., commercial, irrigation, industrial) will vary from agency to agency.

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 it should be recognize for its 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.

Thank you for providing us with the opportunity to comment on the proposed regulatory framework. We believe a collaborative effort during this process will yield the most effective results. If you have any questions regarding our feedback and comments, please contact me at (562) 697-1726.

Yours truly,



TOM COLEMAN
General Manager

/rp