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4232 Las Virgenes Road
Calabasas, CA 91302
(818) 251-2100
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MEMBER AGENCY OF THE
METROPOLITAN WATER
DISTRICT
OF SOUTHERN CALIFORNIA

(12/17/14) Public Workshop
Urban Water Conservation
Deadline: 12/17/14 by 12:00 noon



December 17, 2014

The Honorable Felicia Marcus, Chair
and Members of the Board
c/o Ms. Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Comment Letter – Urban Water Conservation Workshop

Dear Chair Marcus and Members of the Board:

Thank you for the opportunity to provide comments as your Board considers potential additional actions to promote further urban water savings should drought conditions continue into 2015. We appreciate the thoughtful process to solicit comments, providing specific questions to frame public input and organizing a workshop with both water supplier and academic/non-governmental panels. Additionally, we recognize that your Board incorporated many of the public comments provided prior to adoption of the current emergency regulations.

Las Virgenes Municipal Water District (District) understands the importance of urban water conservation measures, particularly during times of drought, to ensure that sufficient water supplies can be preserved to meet basic needs throughout the state. As an early adopter of recycling, the District meets 20 percent of its overall water demands with recycled water. Currently, the District is in the process of transitioning to budget-based water rates to drive water use efficiency in accordance with existing state legislation.

Following is a summary of the District's comments in response to the Board's questions.

1. *What more should be done at the local and/or State level in the near-term to increase water conservation?*
 - Provide support for agencies to implement budget-based water rates through legislation to clarify legal ambiguities, funding for agency conversion costs, and educational outreach. Additionally, call for the California Public Utilities Commission to develop a standard budget-based water rate tariff for use by investor-owned water utilities.

- Accelerate the deadline for all water suppliers to install water meters and bill volumetrically from 2025 to 2016, and provide interest-free loans to accomplish the implementation with “principal forgiveness” for disadvantaged communities.
 - Adopt and expedite implementation of recommendations by the Independent Technical Panel on Demand Management Measures formed by the California Department of Water Resources pursuant to Assembly Bill No. 1420 (2007) with a focus on potential actions by land-use planning agencies to strengthen existing landscaping regulations.
 - Organize and conduct workshops throughout the state to showcase technological innovations that support water conservation, including those for new water-saving devices, customer water use profiling, and improved data management.
 - Implement an additional round of expedited Proposition 84 funding for water-use efficiency and drought-relief projects that can be completed within a pre-determined time-frame.
 - Consider a provision to discourage municipalities from citing and/or fining residents who do not water their lawns or landscaping in an effort to save water, similar to Assembly Bill No. 2100 that applies to homeowners associations.
 - Broaden the scope of Assembly Bill No. 2104 such that it prevents homeowners associations from prohibiting pervious hardscapes that do not require irrigation.
 - Sponsor a statewide media campaign regarding the drought, emergency regulations, and actions required of all California residents to conserve water.
 - Extend the current emergency regulations, which are set to expire in April 2015, for an additional 270 days.
2. *What additional conservation requirements, if any, should the State Water Board consider adopting if dry conditions persist into the New Year?*
- Adopt the “Prohibited Activities in Promotion of Water Conservation” of the current emergency regulations (Sec. 864) such that they remain in effect permanently, with the addition of a requirement to repair faucet, toilet and other plumbing leaks within 48 hours.
 - Add a requirement for restaurants to serve water only upon request and hotels to offer guests the option to reuse their towels and linens.
 - Maintain recognition of budget-based water rates as an acceptable means of alternative compliance with the emergency regulations.
 - Ensure that responsibility for enforcement activities remains at the local level.
3. *What can be done to compel poorer performing areas to increase conservation?*
- Ensure that the proper metrics are used to identify “poor performing areas”, utilizing data sources described in response to Question No. 4.

- Conduct a technical analysis of the poor performing areas, with a peer-review by the California Urban Water Conservation Council, to verify the causes and develop specific response actions:
 - (a) Demand hardening
 - (b) Economic conditions
 - (c) Weather patterns
 - (d) Resource limitations
 - (e) Other
4. *What additional data should the State Water Board be collecting and how would it be used?*
- Collect data from water suppliers to demonstrate that their overall water usage is efficient in accordance with state legislation (i.e. population; total irrigated and/or landscaped area; evapotranspiration rates; and commercial, industrial and institutional needs).
 - Absent the availability of the above-referenced data, collect data to identify:
 - (a) Longer water use trends, focusing on a comparison of GPCD reductions with 20x2020 targets.
 - (b) Changes in economic growth and unemployment rates that are strongly correlated to water demands.
 - (c) Water demands distinguished by customer class (i.e. single- versus multi-family residential and residential versus non-residential).

Again, thank you for considering our input as your Board considers future response measures to the statewide drought. I can be reached at (818) 251-2122 or dpedersen@lvmwd.com for any questions related to our comments.

Sincerely,

A handwritten signature in blue ink, reading "David W. Pedersen". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

David W. Pedersen, P.E.
General Manager