



Dear State Water Resources Control Board,

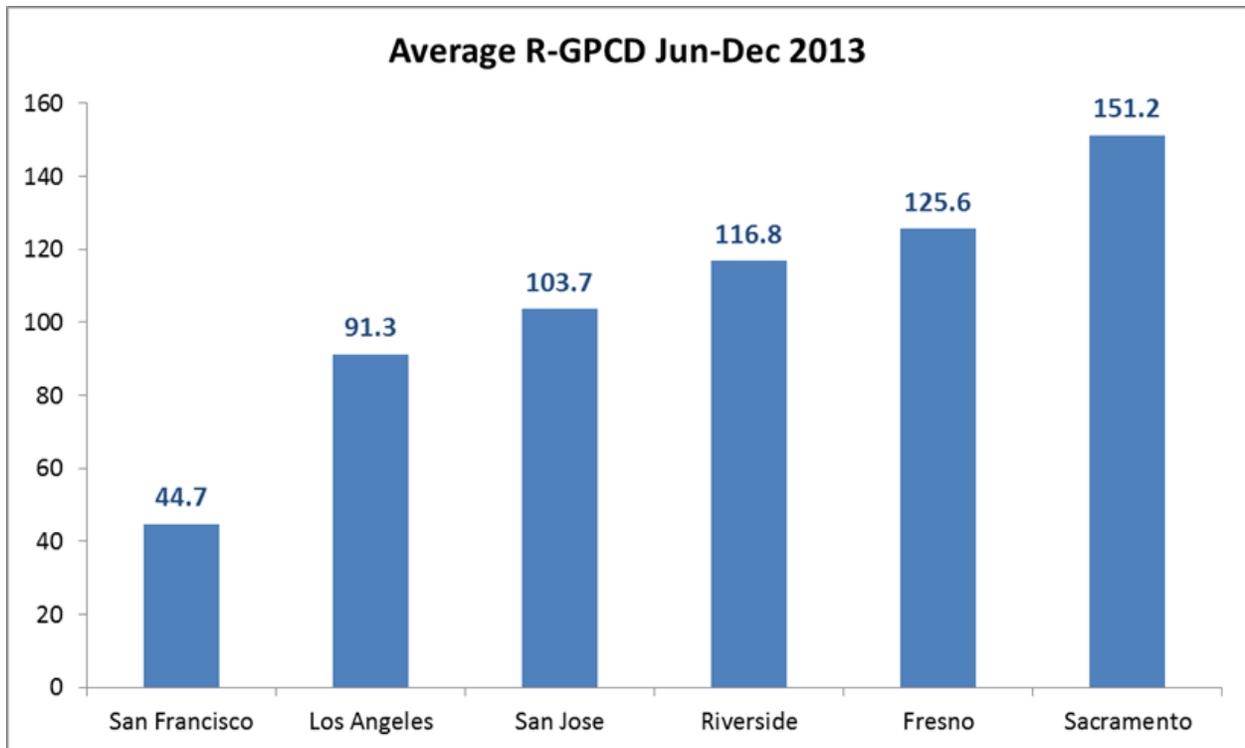
Thank you for the opportunity to comment on the proposed extension of the Emergency Conservation Regulations. LADWP supports the extension and SWRCB's efforts to get California to conserve water as we enter into the fourth year of the statewide drought.

Our comment is to recommend using 2007 as the base year rather than 2013. 2007 was the year prior to the previous drought that affected many water agencies throughout California. Using 2007 would allow the SWRCB's percent water use reduction methodology to account for significant conservation measures and mandatory water use restrictions that many water agencies enacted prior to 2013 and kept in effect to date. At a minimum, we request that the SWRCB add a specific field in the reporting form for the 2007 water use and allow water agencies the option to submit this additional data.

The SWRCB explained that 2013 was chosen as the baseline as this was considered the year that the drought became critical. However, this explanation oversimplifies the complexities that exist in choosing a baseline for monthly reporting. Additionally, this discounts any water savings achieved during the first two years of the drought and during any other recent years with dry periods.

LADWP, for example, has had an Emergency Water Conservation Plan Ordinance in effect since 2008, restricting outdoor usage during all this time. The outdoor restrictions have been proven to help reach conservation levels equivalent to the SWRCB's Emergency Regulations' expectations. However, the water savings from these mandatory restrictions are completely negated based on the SWRCB's use of 2013 as a base year.

Different regions across California were using far different levels of water during 2013. Even regions with comparable population densities and weather patterns were not using the same levels of water in 2013.



The graph above illustrates that water suppliers from some of the major California cities are starting at different efficiency levels in 2013, proving that some suppliers have achieved higher levels of water conservation prior to 2013 than others. Using 2013 as the base year for comparison of all water suppliers discounts any previous water conservation those suppliers had already achieved prior to 2013 and before the drought became critical.

Penny Falcon, P.E.

*Water Conservation Policy, Legislation, and Grants Manager
 Los Angeles Department of Water and Power
 213-367-4647*

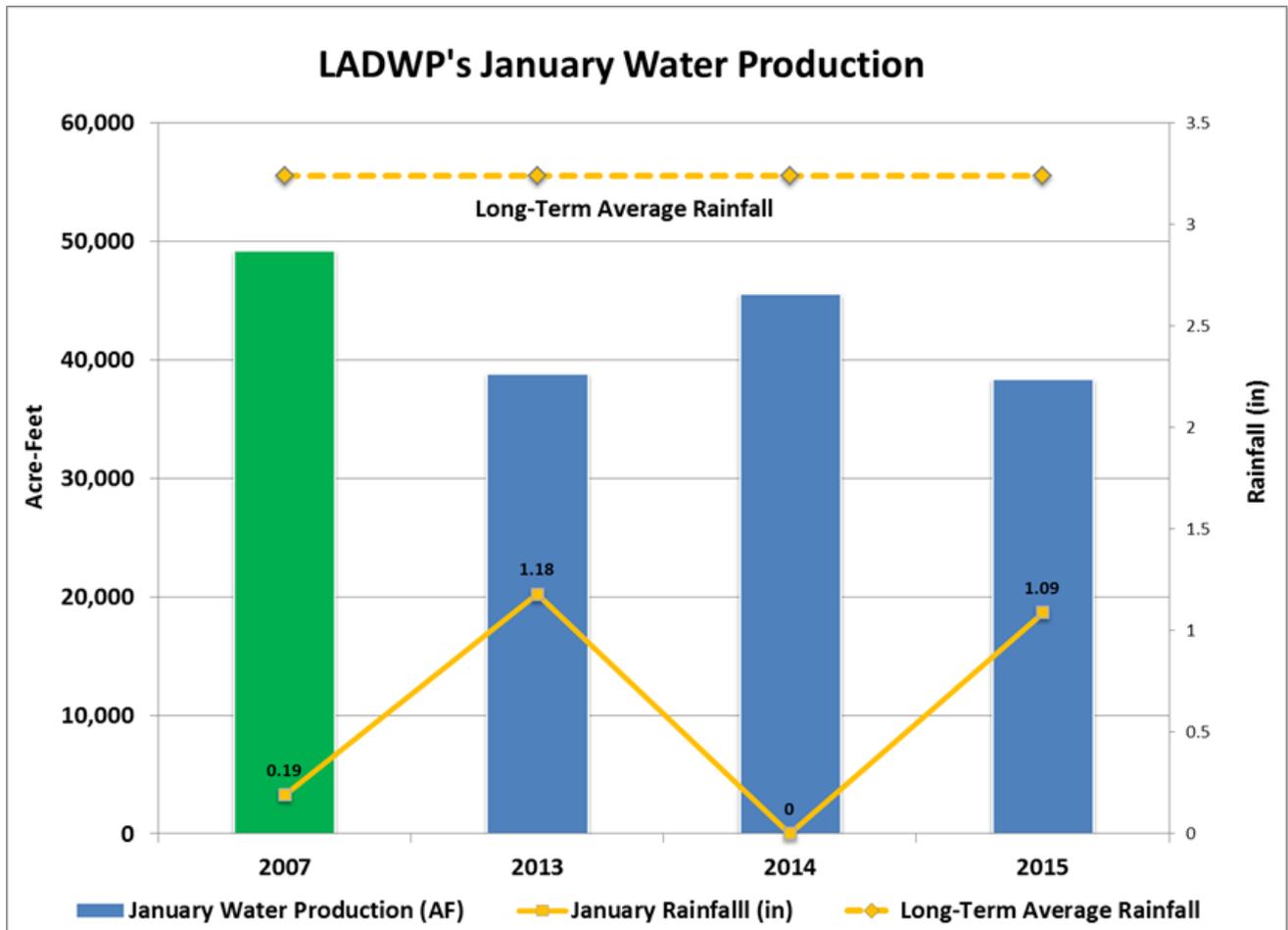


From: Falcon, Penny
Sent: Friday, February 27, 2015 12:43 PM
To: Jeanine Townsend (Jeanine.Townsend@waterboards.ca.gov)
Cc: Eric Oppenheimer; Pettijohn, David; Lam, Jevon; Marcus, Sofia
Subject: LADWP Information - SWRCB Water Conservation Reporting
Importance: High

Dear State Water Resources Control Board,

On February 17th, the Los Angeles Department of Water and Power (LADWP) submitted its monthly data to the SWRCB for January 2015. Comparing January 2015 to January 2013, LA showed a **1.1%** reduction in water use which is a major decrease from December 2014 which showed **21%** reduction. This fluctuation based on the SWRCB's methodology for percent reduction is extremely concerning to LADWP, and we would like to provide the SWRCB with an explanation as to why there are such big fluctuations month to month.

The following chart summarizes our January rainfall and water production data:



January 2015's temperature was 6 degrees hotter than normal and precipitation was only a third of the long-term average. Contrary to the SWRCB's expectations, comparing January 2015 to January 2014 yields a much higher reduction in water use of **15.8%**.

Most importantly, LADWP's outdoor watering restrictions have been in place since 2008. However, the 2013 baseline completely negates LADWP's outdoor watering restrictions savings because it was in place during the 2013 base year. Comparing January 2015 to January 2007 would yield **22%** water use reduction.

LADWP strongly recommends the following:

1. Use the 2007 year or a multi-year baseline in that timeframe to better account for temperature, rainfall, and economic recession factors as well as account for significant conservation measures many water suppliers implemented right before the Emergency Regulations took effect.
2. Work with the Department of Water Resources Urban Stakeholder Committee and the California Urban Water Conservation Council to further refine the current metrics and develop any long-term metrics to measure efficient water use.

Thanks for distributing this information Jeanine. Please feel free to contact me if you have any questions or need the data in a different format.

Penny Falcon, P.E.

Water Conservation Policy, Legislation, and Grants Manager

Los Angeles Department of Water and Power

213-367-4647



The banner features the LADWP logo on the left, the title "Water Your Lawn 3X A Week Max" in large white text, and a "STATEWIDE DROUGHT" logo on the right. Below the title are two boxes: "ODD Addresses Mon Wed Fri" and "EVEN Addresses Tue Thu Sun". A purple arrow at the bottom right points to the website "LADWP.com/WaterConservation".