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April 13, 2016
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
Email: commentletters@waterboards.ca.gov

Attention:
Jeanine Townsend, Clerk to the Board



RE: Comment Letter – Urban Water Conservation Workshop

Dear State Water Board,

Thank you for the opportunity to comment on existing State water conservation regulation. It is our understanding that the State is interested in receiving feedback on following:

What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?

How should the State Water Board account for regional differences in precipitation and lingering drought impacts, and what would be the methods of doing so?

To what extent should the State Water Board consider the reliability of urban water supplier supply portfolio in the emergency regulation?

Valley Water Company (Valley) and its rate payers have used their very best efforts to comply with the letter and spirit of the existing regulations. We understand that existing regulation continues with the use of residential gallons-per-capita-day (gpcd) number to compare water use between agencies for determining required percentage reduction. Generally, when comparing gpcd use, many factors are reviewed in conjunction, including but not limited to: rainfall, temperature and evaporation rate; population growth; and existing population density and land use (i.e. number of people per acre of land). However, these factors are not fungible, and not equally applicable in every case. The factors should be considered, and weighted, on a case by case basis, with each factor given appropriate weight for its locale and circumstances. For example, we have seen uneven rain patterns between areas of the state that were not anticipated during the planning stage. This coupled with the wide divergence of conservation opportunities as a function of population density, has applied the factors, unevenly, and to the detriment of a residential community such as

Valley's franchised area. This factor, in future planning, should be given substantially more weight. We are all striving for conservation, but our realistic opportunities differ substantially from more urbanized locales. These factors should be appropriately re-weighted in future planning.

As for regional weather differences and supplier portfolio, it is prudent to understand regional infrastructure investments, built for supply continuity.

In past drought cycles, our customers have always reduced consumption and for many, becoming a way of life. In 2015, we experienced extraordinary conservation activities and we intend to continue with our tireless outreach. It is anticipated that cooperation will continue, given conservation requirement credible, consistent with current water conditions.

Thank you for this opportunity to submit our comments. Please feel free to contact me should you have any questions.

Sincerely,
Bob Fan
General Manager