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Councilmember

April 10, 2015

The Honorable Felicia Marcus
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter-Mandatory Conservation Achieving a 25% Statewide Reduction in Potable Urban Water Use

Dear Chair Marcus:

The City of Paramount appreciates the opportunity to provide comment to the proposed framework to achieve aggregate statewide 25% reduction in potable urban water use. Paramount has taken seriously the call for reduction in potable water use as a result of the on-going drought.

We have reviewed the proposed framework and would like to make the following observations and suggestions:

1. The conservation standard for those agencies that have between 55 R-GPCD and 110 needs to have more variability than 20%. Paramount, which has an R-GPCD of 61.2, will need to achieve the same 20% conservation standard as an agency that uses almost twice as many gallons per day. We would propose that there be a lower conservation standard than 20% for those agencies in the lower end of the range.
2. Land use should be a factor in considering the effectiveness of the conservation standard. Agencies that serve communities with larger parcel sizes, particularly in urban areas, will have larger percentage of their water use directed towards irrigation. In Paramount, the average single family residential parcel is 5,000 sq. ft. In most urban communities, 7,500 sq. ft. is the average single family residential parcel size. In fact, most of the new construction that has occurred in Paramount over the last 20 years is on lots that average around 3,000 sq. ft. Paramount also has many lots that are only 50 feet wide and with minimal

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setbacks, these lots have little room for extensive landscaping. This means that most of the water use for our residential customers is for personal consumption, which is much more difficult to reduce.

3. The calculation of total water production used in determining the conservation standard is based upon a comparison of production from 2013 to 2014/15. We believe that a more accurate base year would be 2012. In 2012, conservation efforts intensified in many communities. By 2013 and moving into 2014 great strides had been made in achieving water conservation. Using 2013 as the base year gives an incomplete picture of the water conservation progress made in many communities.
4. The proposed new reporting requirements ask for information that does not conform to the records that many water utilities keep. Our customers are billed according to their meter size with the understanding that larger meter sizes are used by commercial and institutional customers. While we can make assumptions about the types of customers who use specific meter sizes our billing records do not distinguish to the degree where you can separate large institutional and commercial users from landscape and non-landscape use.
5. We would support the inclusion of small water suppliers both urban and non-urban in the reporting and regulatory requirements that are imposed by the State Board for drought related conservation. There should be no distinguishing between urban and non-urban or small or large water systems.

Thank you again for the opportunity to provide comments for the proposed regulations. If you have any questions, please do not hesitate to contact me at 562-220-2100 or ccash@paramountcity.com

CITY OF PARAMOUNT



Christopher S. Cash
Director of Public Works