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April 9, 2015

Jessica Bean - State Water Resources Control Board

Re: Mandatory Conservation Proposed Regulatory Framework

Small Water Suppliers Requirement - 25% reduction over 2013 water use.

With the highest regard to maintaining a safe and sustainable amount of water for the urban population of California, we are requesting consideration from the State Water Resources Control Board to be considered a tier 1 water supplier. We are Channel Islands Beach Community Services District, a Special District, which supplies water to the beach communities of Silverstrand, Hollywood Beach, Hollywood by the Sea, and Channel Islands Harbor.

Within the guidelines of the Governor's emergency proclamation we have adopted a Stage II Water Supply Shortage for the areas we serve. We are not required to report our reduction numbers as we are a small urban water supplier. However, we have been tracking the progress of our conservation efforts and have made significant reductions that would qualify us to be considered a Tier 1 urban water supplier.

During the first three months of 2015 we have averaged an 8.8% reduction of water purchased compared to the same period in 2013. We have also been tracking our R-GPCD which is averaging 43.6 R-GPCD for this same period. In the last three months of 2014 the R-GPCD averaged 44.9. Overall in 2014 the R-GPCD averaged 51. (See Attached)

The Channel Islands Beach Community Services District consists of high density communities that have little or no outside landscape where we could achieve the larger reduction numbers that many inland communities can achieve by curtailing outside water use. As part of our Stage II Water Supply Shortage declaration we restricted watering to one day a week, mandate leaks be fixed within 48 hours, perform daily, 100% of our service area inspections for water waste or non compliance with the Stage 2 mandates. We have always aggressively enforced a restriction on no runoff and washing down of hard surfaces.

We are facing potentially incredible penalties to meet our water service requirements with mandatory reductions of 20% in ground water allocation set in place under Emergency Order E from the Fox Canyon Groundwater Management Agency and the very real possibility of only receiving 20% of our State Water allocation.

To meet an additional 10% reduction will be difficult but to face the challenge of meeting a 25% reduction in a community that has been conserving for many years and has one of the lowest

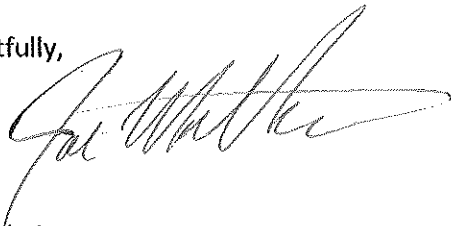
documentable R-GPCD in the State, is just unreasonable. The attached reports support the above statements and demonstrate we have been making monumental strides in water conservation over the past ten years

As a partner invested in a sub-regional water group, Port Hueneme Water Agency, we would be severely restricted in our efforts to develop sustainable regional water sources if we are mandated and fined at a Tier level we cannot achieve. We are currently raising rates in anticipation of funding capital projects with our Regional Partners that will bring new sustainable supplies to our region. These projects come with huge capital outlay; and to divert our financial resources to paying fines under unachievable cut back requirements is counterproductive to the goal of developing new sustainable water supplies for California.

The Channel Islands Beach CSD respectfully requests that you apply the same guidelines afforded to large water suppliers that have been reporting their conservation efforts. We believe we have demonstrated our conservation efforts and thus deserve the same consideration.

We thank you in advance for your consideration of our comments.

Respectfully,

A handwritten signature in black ink, appearing to read "Joe Mathein", written in a cursive style.

Joe Mathein

Operations Manager

Channel Islands Beach CSD

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## Channel Islands Beach CSD

AF per Year

<b>2003</b>	675.59
<b>2004</b>	703.93
<b>2005</b>	644.21
<b>2006</b>	622.62
<b>2007</b>	677
<b>2008</b>	587.39
<b>2009</b>	559.6
<b>2010</b>	530.2
<b>2011</b>	532.86
<b>2012</b>	549
<b>2013</b>	542.97
<b>2014</b>	521.47

R-GPCD Comparison

2014		2015		
	R-GPCD		R-GPCD	
Jan	47.2	Jan	<b>44.7</b>	<b>-2.5</b>
Feb	40.9	Feb	<b>39.5</b>	<b>-1.4</b>
Mar	48.1	Mar	<b>46.7</b>	<b>-1.4</b>
April	48.7	April		
May	58.8	May		
Jun	56.1	Jun		
July	62.6	July		
Aug	62.3	Aug		
Sept	51.9	Sept		
Oct	44.1	Oct		
Nov	47.3	Nov		
Dec	43.4	Dec		

Year to Year Comparisons AF Purchased

	2013	2014		2013	2015	
Jan	41.17	40.28	-2.20%	41.17	38.16	7.40%
Feb	37.45	34.91	-6.80%	37.45	33.73	10%
Mar	43.70	41.03	-6.20%	43.70	39.89	9%
April	41.59	41.53	-0.02%	41.59		
May	46.07	50.20	7.30%	46.07		
Jun	51.28	47.90	-6.60%	51.28		
July	53.40	53.44	1%	53.40		
Aug	51.35	53.14	3.40%	51.35		
Sept	50.07	44.27	-12.00%	50.07		
Oct	45.31	37.61	-17%	45.31		
Nov	40.21	40.37	0.40%	40.21		
Dec	41.39	36.78	-12%	41.39		
Total	542.97	521.47	4.00%	542.97		