

Dear Ms. Bean:

Attached, please find a comment letter (below) from the Walnut Valley Water District regarding the mandatory conservation – proposed regulatory framework. Thank you.

:: Mike Holmes, General Manager

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The Walnut Valley Water District has been an urban water supplier for more than sixty years and fully understands the drought's significance and its threat to California. We appreciate and support the state's efforts to eliminate water waste and to extend our precious resources; we also appreciate the opportunity to provide comments:

We suggest that the Board consider the following:

- Per capita reporting should be based upon a twelve-month period and not a single month.
- The compliance period should also be based upon a twelve-month period versus the proposed nine-month period.
- The compliance period makes no allowance for weather conditions, which will dramatically alter water-use patterns (i.e., weather in 2013 base period compared to the present use period).
- Should an agency fail to achieve the required target reduction number, yet has implemented every tool available to encourage conservation, compliance should be granted.
- Be prepared to make allowances for how information is reported as customer sector information (i.e., commercial, irrigation, industrial) will vary from agency to agency.
- Much of the focus is on urban water usage; the Board should direct similar reductions in agriculture uses and water dedicated for environmental uses.

We are concerned that the baseline chosen for compliance does not consider or acknowledge previous conservation efforts, nor does it give credit for actions and reductions since the last drought (i.e. implementation of tiered-rates). Also, there is no consideration of reductions in potable irrigation as a result of the development, at significant expense, of recycled water facilities to permanently shift the source of irrigation water from potable sources. Some consideration of how to factor this recycled water use into outdoor irrigation reduction should be incorporated into the Regulation. It will be increasingly difficult for operators of recycled water systems to make large reductions in CII irrigation if many of their large users are already using recycled water.

With respect to the general questions posed by the Board:

1. Are there other approaches to achieve a 25% statewide reduction in potable urban water use that would also impose a greater responsibility on water suppliers with higher per capita water use than those that use less?

Many urban areas have already saturated indoor conservation use with water saving devices and practices. Therefore, a majority of the savings must come from outdoor water use, most notably irrigation. Directives to further restrict outdoor watering should be considered in these higher per capita areas.

2. How should the regulation differentiate between tiers of high, medium and low per capita water users?

Based on the R-GPCD Conservation standards proposed, the Regulation would differentiate between tiers of users.

3. Should water suppliers disclose their list of actions to achieve the required water restrictions?

As a part of the public record, public agencies would most readily identify the programs it has implemented to foster conservation.

4. Should these actions detail specific plans for potable water use reductions in commercial, industrial, and institutional (CII) sectors?

This would be extremely difficult to develop and enforce as uses within these sectors can vary greatly.

5. Should additional information be required in the monthly conservation reports for urban water suppliers to demonstrate progress towards achieving the required water reductions?

If urban water suppliers are significantly below their target reduction goal, perhaps the additional reporting of steps taken or proposed to be taken to reduce water use should be requested.

6. How and when should compliance with the required water reductions be assessed?

Compliance with programs and restrictions should be ongoing.

Compliance with the 25% (or other reduction goal) should be over an extended period such as twelve months, not measured month to month.

7. What enforcement response should be considered if water suppliers fail to achieve their required water use reductions?

Water suppliers are in the business of providing safe and reliable water supplies for our communities. If a water purveyor takes every available step to mandate conservation, yet fails to achieve the targeted goal, how can an enforcement action be taken as individual customers may flaunt or exploit conservation mandates to their advantage—or if cost is not an immediate concern. We will utilize a variety of methods to achieve conservation as already detailed in our recently approved 5-year rate structure (including specific drought rates) and as contained in our rules and regulations.

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We appreciate the opportunity to provide comments. Please contact me if you should have any questions or if I may be of any additional service.

Michael Holmes
General Manager

Walnut Valley Water District

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