

April 13, 2015

Mr. Eric Oppenheimer
Director
Office of Research, Planning and Performance
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95812-0100

Comment Letter: Proposed Drought Regulatory Framework

Dear Mr. Oppenheimer,

Casitas Municipal Water District (Casitas) thanks the State Water Resources Control Board (SWRCB) for the opportunity to contribute comments on the proposed regulatory framework for implementing the Governor's April 1, 2015, 25% urban water reduction mandate. Casitas offers several recommendations for the SWRCB's proposed emergency drought rule making.

Background:

The Casitas water service area is solely dependent on local surface water (Lake Casitas) and groundwater supplies for agricultural and urban uses. There is no dependency on State Water deliveries in the service area. Casitas' surface water operates as both a primary source of water supply for areas without groundwater and as a drought backup supply for multiple customer groups and individual accounts that primarily rely on local groundwater sources. The demand for Lake Casitas water supplies increases over the duration of drought. Presently, Lake Casitas has declined to 50 percent from being nearly full in 2005.

Casitas recommends the SWRCB consider the following:

1. Bi-monthly billing accommodations within calculations. Change 2013 GPCD *monthly* calculations in SWRCB's website data tool to allow ability to make comparisons with present *bi-monthly* customer data to include a 60 day versus 30 day period and for population percentage changes for alternating months.
2. Subtract residential customers that operate hobby farms from residential and urban water usage calculations.
3. Subtract residential, institutional, and commercial customers with water wells from urban water usage calculations or factor in their usage increases during drought periods.
4. Casitas recommends that large institutional or commercial customers be allowed to reach their 25% reduction on an annual basis rather than month to month.
5. Clarification of 35% reduction in water usage. It is unclear what the baseline is for this proposed reduction. Casitas recommends a residential water usage reduction only as it compares to 2013 water usage.

Bi-Monthly Billing Accommodated in Calculations

Casitas' most significant concern is regarding the proposed regulatory framework for the Gallons Per Capita Day (GPCD) calculation. SWRCB's GPCD calculations generate numbers that can misrepresent the actual water usage for some water agencies such as Casitas that utilize bi-monthly billing. With a bi-monthly reading, the number of days and population assumptions can be skewed so that the GPCD calculation might not be accurate. For example, the September 2014 calculation as proposed by the SWRCB calculates a 253 GPCD, which omits 63.78% of Casitas' residential water users since they are billed on a separate month. An average of the two month period of September and October calculation of the GPCD cannot be made either, since the populations are not weighted equally. The September GPCD figure is misleading as well because it represents a warmer than average two month period of the year, so an annual GPCD figure would be even lower or more representative of actual usage.

The SWRCB's 2013 GPCD data utilizes a monthly methodology when it compares to present bi-monthly data, which is not comparing apples to apples. In fact, when Casitas enters its bi-monthly data, an error message is generated in SWRCB's online data tool, even though the inputted data represents a more accurate representation of water usage.

Hobby Farms subtracted from Residential usage

Casitas' service area includes many hobby farms that use more than 6 acre-feet a year, but they are considered residential customers. Casitas recommends the SWRCB omit hobby farms that include agricultural planting and/or horse ranching from residential and urban water usage.

Well Using Accounts subtracted from Residential and Urban Usage

Some of Casitas' urban water use during droughts is the result of Casitas operating as a backup water supply for residential customers that primarily or in part rely on water wells. Casitas also has commercial and institutional customers that use well water and then use Casitas' water more heavily during multi-year drought periods. Casitas recommends these customers be subtracted from residential and urban usage numbers being reported to the SWRCB because their drought usage is expected rather than needing curtailment.

Annual Allocation for Large Commercial Irrigation Customers

Casitas' golf courses have suggested they would have great difficulty in meeting month to month 25% target reductions as compared to an annual 25% target reduction.

Clarification of 35% Reduction

It is unclear what the baseline is for the proposed 35% water use reduction. Casitas recommends a reduction in residential customer water usage as it compares to 2013 water usage. It is unclear whether the SWRCB's proposal refers to a 35% reduction as compared to September 2014 GPCD, or to 2013 residential usage, or to all urban water usage.

Conclusion

It is important that SWRCB provides a methodology that accurately represents water usage and equitably directs water demand reductions, otherwise consequences such as targeted unnecessary hardships will result on particular communities and customers. SWRCB's current proposals unless amended have the potential to create long-term economic hardship without effectively contributing to some local water agencies successful water management efforts during this current drought.

Your consideration of our recommendations is greatly appreciated. Please feel free to contact me if you should have any questions or seek clarification.

Sincerely,

Ron Merckling
Public Affairs/Resource Manager

Cc; Jeanine Townsend, Clerk to the Board