

Good Afternoon Honorable Chair and Board Members;

Thank you for the opportunity to provide comments on the draft regulations as proposed. Below are our concerns as a municipality in the Southern California Morongo Basin. Please include these comments as part of the record related to the proposed emergency regulation:

1. There is no geographical consideration in the regulation. Some effort should be included to recognize variant conditions. A factor such as that used by electrical utility operators in establishing baseline demand should be considered.
2. No consideration is provided for existing rate structure or unit cost. Agencies that provide water with a unit cost four or five times the state average should be recognized as already providing substantial conservation standards. To then apply a blanket standard does not consider the conservation plan already in place through elevated pricing standards.
3. The regulation does not accommodate potential construction in progress for various programs. For example, the Town is in the middle of administering a State Parks Grant, that includes limited sod installation, and the imposition of a blanket conservation standard target does not provide flexibility in meeting both the state goal of water conservation and active play opportunities as required in the state grant program.
4. Data collection appears to be inconsistent from provider to provider, thus setting conservations standards that do not appear reasonable. For example, how does an arid, non-landscaped Town in the desert have the same conservation standard as the City of San Diego, with high humidity and fully landscaped mature communities?
5. Unadjusted conservation standards will unfairly burden those communities with extensive and long-planned conservation efforts. For example, Yucca Valley, with long-implemented water conservation characteristics as evidenced by water rate structures resulting in costly service are faced with an identical conservation standard as an agency with practices that do not encourage water conservation. Also, Yucca Valley residents have chosen to support conservation through public green spaces in place of residential green spaces. There is no recognition of those efforts in the draft regulation, and as such, unfairly burden such leaders in conservation, particularly those in disadvantaged communities such as Yucca Valley.
6. The blanket conservation standards do not account for regional service providers that assist in conservation efforts. For example, the Town of Yucca Valley provides services to the region, much beyond the immediate Town limits. With extensive long-term

conservation practices already underway as evidenced by lack of greenspace region-wide, the ability of the water producer to meet its conservation standard may require the participation of the municipal service provider, thus impacting an entire region. Meanwhile, affluent communities with ample greenspace are not faced with the same expectation.

7. In sum, the regulations must look beyond a single year of conservation practice, and must incorporate existing rate structures. This will provide a balanced approach between those communities where conservation is a way of life, versus other communities that are recently implementing conservation efforts. The Town of Yucca Valley fully supports the Hi Desert Water Districts efforts and suggestions in developing a conservation standard that fairly and efficiently achieves maximum compliance and water savings results.

Thank you for your consideration of these comments.

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