



CITY OF LA VERNE CITY HALL

3660 "D" Street, La Verne, California 91750-3599
www.ci.la-verne.ca.us

April 13, 2015

Ms. Jessica Bean
State Water Resources Control Board
Sacramento, Ca

Re: Comments on Draft Regulatory Framework to Implement 25%
Water Conservation

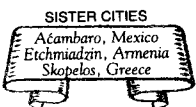
Dear Ms. Bean:

The City of La Verne has been an urban water supplier for more than 100 years and fully understands the drought's significance and its threat to California. Our community has maintained a very active water conservation program since the early 1990's for this very reason.

We appreciate and support the state's efforts to eliminate water waste and to stretch our precious resources. However, one thing must be understood and agreed: water use and demands do not fit into "one size fits all" categories. For example, although per capita water use generally provides a solid comparison between water agencies, it is only as good as the information used to generate the number. Your Board requires water suppliers to provide this information on a monthly basis, but La Verne only bills its customers bimonthly. Further, to bill our entire service area requires four billing cycles over this two month period. Therefore, La Verne's per capita numbers will vary greatly month to month dependent upon the estimated number of residential customers included in that particular billing cycle and month. More importantly, the reported per capita numbers do not and will never reflect production and use in the same month.

We therefore suggest that the Board consider the following:

1. Per capita reporting should be based upon a 12 month period, not a single month.
2. The compliance period should also be based upon a 12 month period versus the proposed nine month period.
3. The compliance period make 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).



General Administration 909/596-8726 • Water Customer Service 909/596-8744 • Parks & Community Services 909/596-8700
Public Works 909/596-8741 • Finance 909/596-8716 • Community Development 909/596-8706 • Building 909/596-8713
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4. Should an agency fail to achieve the required target reduction number, yet has implemented every tool available to encourage conservation, compliance should be granted.
5. 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.
6. Much of the focus is on the urban water user, the Board should direct similar reductions in agriculture uses and water dedicated for environmental uses.

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 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?

No response.

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

Any agency would be happy to identify the programs it has implemented to foster conservation.

4. Should these actions detail specific plans for potable water use reductions in the 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?

No response.

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

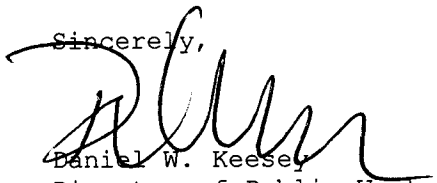
Compliance with programs and restrictions should be ongoing. Compliance with the 25% (or other reduction goal) should be over an extended period such as 12 months.

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 step imaginable to force conservation, yet fails to achieve the targeted goal, how can an enforcement action be taken? Maybe the Board should consider mandating higher water rates for all water sectors but residential, impose uniform, budget based water allocations for residential use, and identify the penalties that should be imposed for exceeding those targets.

We appreciate the opportunity to provide comments. Please feel free to contact me if you should have any questions.

Sincerely,



Daniel W. Keeseey
Director of Public Works