

LAGUNA BEACH COUNTY WATER DISTRICT

(7/15-16/14) Board Meeting- Item 10
Urban Water Drought Emergency Regulations
Deadline: 7/14/14 by 12:00 noon

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INCORPORATED 1925

July 11, 2014

Honorable Felicia Marcus
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812



Re: Comments on Potential SWRCB Emergency Drought Regulations

Dear Chair Marcus:

Thank you for the opportunity to provide comments for the State Water Resources Control Board's (SWRCB) consideration regarding the development of emergency regulations related to urban drought response. Laguna Beach County Water District (LBCWD) would like to offer a few comments for your consideration as you draft the urban drought regulations.

Specifically, the District is concerned that the emergency drought regulations do not take into account current conservation measures, regional drought conditions, or financial investments made to limit the impacts of drought. Our agency has adopted a Water Use Efficiency and Water Supply Shortage Ordinance, as well as a water shortage contingency plan as part of the District's Urban Water Management Plan, to be implemented according to local drought conditions. The emergency regulations should require that all agencies adopt a water shortage contingency plan that is activated according to the local drought situation.

In 2010, the District adopted an allocation-based tiered rate structure, based on property specific water budgets, which targets overuse and resulted in greatly reduced water usage. This effort has enabled the District to meet the Governor's 20 percent water reduction by 2020, six years ahead of schedule. This approach has enabled the District to successfully meet the target per capita per day use required by the governor's mandate without the need to impose mandatory restrictions. This lower demand on the state's water supplies is a benefit for the entire state, because it means those impaired supplies can go further. If the SWRCB implements mandatory use restrictions, it should consider waiving those provisions for areas that have conservation tiered rate billing structures, as this type of rate structure serves as a means to encourage the desired conservation.

LBCWD encourages the SWRCB to consider the flexibility local agencies need when responding to the drought and local conditions. We urge the SWRCB to consider including this flexibility into its emergency drought regulations and allow agencies to maintain demand management tools to address their local drought conditions.

Thank you for considering LBCWD's comments in the development of the emergency regulations.

Sincerely,

Renae M. Hinchey
General Manager