



CITY OF GLENDORA CITY HALL

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January 28, 2016

The Honorable Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: 2/2/16 BOARD MEETING (Conservation Extended Emergency Regulation)

Honorable Felicia Marcus and Members of the Board,

The City of Glendora appreciates the opportunity to provide input on the State Water Resources Control Board's (Water Board) Proposed Text of Emergency Regulation released January 15, 2016 for the extension of urban water conservation. We appreciate the Water Board's interest in stakeholder's comments and the willingness to consider such comments as they implement the Governor's Executive Order B-36-15 issued on November 13, 2015 extending conservation regulations to October 31, 2016.

We appreciate the State Board's review of the existing regulatory framework and the attempt to offer some relief through modifications however the proposed adjustments offer little, if any relief to the City of Glendora. We recognize the challenge the State faces as the drought continues and as stated in earlier correspondence, the City of Glendora has been dedicated to conservation and water use efficiency long before it became a State mandated requirement.

In 2008, Glendora implemented Phase I Water Conservation Measures. These measures included many of the regulations included in the current Emergency Regulations and remained in place until the State regulations were mandated at which time Glendora prepared and adopted an Emergency Drought Response Plan. Prior to the State mandate, Glendora water customers had already sustained a water use reduction of 12% since 2008 and since the mandate went into effect, Glendora customers have stepped up to the challenge making efforts to meet the additional 36% conservation standard set by the State. The City continues to believe that those suppliers, such as Glendora, who began conservation prior to 2015 are not justly credited for the conservation already attained.

Moving forward, we are concerned that the Proposed Text of Emergency Regulations will continue to unjustly exclude Glendora from justifiable water conservation credits or adjustments to our conservation standard as they relate to climate and growth.

PRIDE OF THE FOOTHILLS

City of Glendora Comments and Suggestions:

- **Climate Adjustment**

Glendora is situated within CIMIS ETo Zone 9 and has an approximate 5% deviation from the Statewide average ETo, yet according to the Draft Urban Water Supplier Tiers with climate adjustment released on January 25, 2016 we are not afforded the climate adjustment of 2%, the number established by the Water Board for deviations between 5% – 10%. Glendora is a suburban community with average to large size parcels and approximately 18,000 trees. Both the City and many of our water customers have made modifications to our landscapes, removing turf and replacing with water efficient choices and switching to more efficient irrigation methods; however as most will agree trees are invaluable and as we strive to maintain our 36% target we have seen our trees suffer.

A climate adjustment is warranted for the City of Glendora and all suppliers within Zone 9. More than 40% of suppliers have an advantage with an ETo at or above the statewide average. The State Board states that the regulations are intended to be equitable, yet suppliers with an advantageous ETo are allowed the benefit without any additions to their conservation standard and disadvantaged suppliers at or near the 5% deviation have not been credited with the 2% adjustment written into the Proposed Text of Emergency Regulations. This places an unfair burden on warmer regions in the State.

Glendora continues to recommend that the climate adjustments should be increased to reflect adjustments of 4% to 8% as represented in the table below. Additionally, all suppliers in Zone 9 should be credited with a reduction as established for the zones with a deviation of 5-10%.

Deviation from Average ET	Reduction in Conservation Standard
>20	8%
10-20%	6%
5-<10%	4%

- **Growth Adjustment**

The City of Glendora appreciates the adjustment to the proposed revised regulations originally released December 21st with regard to considering the number of new permanent residents in lieu of new residential connections. We are still concerned with the burden of the calculation and its reliance on information, such as the amount of new residential landscaped area, which many suppliers do not generally have available. This presents a barrier to suppliers in calculating the proposed adjustment and could be considered infeasible to implement.

Additionally the proposed growth adjustment uses growth from 2013 through 2015 and does not account for growth of new residents and additional landscaped yards added in 2016 further

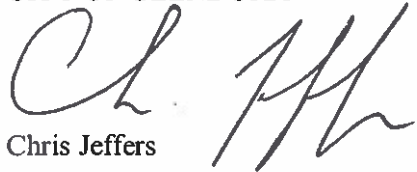
skewing our conservation results. Glendora anticipates adding approximately 400 residents in 2016.

It is suggested that the Water Board reconsider the growth adjustment calculation to incorporate information that is readily available, such as average consumption based on 2015 data and incorporate 50% of the projected growth based on approved projects for 2016.

Thank you for your consideration of the above commentary. I can be reached at (626) 914-8201 or cjeffers@ci.glendora.ca.us.

Sincerely,

CITY OF GLENDORA



Chris Jeffers
City Manager

C: Glendora City Council