



## Rubio Cañon Land and Water Association

583 E. SACRAMENTO STREET, ALTADENA, CA 91001-3023 (626) 797-0509 • FAX (626) 797-0520

April 13, 2016

State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Email: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

Attn: Jeanine Townsend, Clerk

Re: Comment Letter – Urban Water Conservation Workshop

Dear Members of the Board:

Thank you for the opportunity to comment on existing water conservation regulations. It is Rubio's understanding that the State is interested in receiving feedback on the following items:

*What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?*

*How should the State Water Board account for regional differences in precipitation and lingering drought impacts, and what would be the methods of doing so?*

*To what extent should the State Water Board consider the reliability of urban water supplier supply portfolio in the emergency regulation?*

Rubio Cañon Land and Water Association (Rubio) and its rate payers have used their very best efforts to comply with the conservation and spirit of the existing regulations. Rubio understands that existing regulations continue with the use of residential gallons-per-capita-day (GPCD) number to compare water use between agencies for determining required percentage reductions. Generally, when comparing GPCD use, many factors are reviewed in conjunction, including but not limited to: rainfall, temperature, evaporation rate, population growth, and existing population density and land use.

Factors taken into consideration are not equally applicable in every case. The factors should be considered, and weighted, on a case by case basis. Each factor should be given the appropriate research for its location and community circumstances. For example, we have seen uneven rain patterns between areas of the state that were not anticipated during the planning stage. The community dynamics play a vital role on the accomplishments of conservation. Many parcels in our service area are oversized, and members of the community grow their own vegetables, fruit, and raise livestock. With these factors, more analysis and consideration should be given. In addition, regional weather differences, supplier infrastructure and storage capacity also contribute to the continuity of a water system.



As a whole, the entire State has accomplished a great deal of success in continued conservation efforts. Rubio has expended a tremendous amount of time, money, and community outreach to help us achieve our goals. We understand that community cooperation is vital in continuing conservation.

Thank you for this opportunity to submit our comments. I may be reached at [lisa@rclwa.org](mailto:lisa@rclwa.org) for further questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa Yamashita-Lopez', with a long, sweeping horizontal stroke extending to the right.

Lisa Yamashita-Lopez  
General Manager