



April 13, 2015

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

Subject: Mandatory Conservation Proposed Regulatory Framework

Honorable Felicia Marcus and Members of the Board:

The City of Glendora appreciates the opportunity to provide comments on the State Water Resources Control Board (Water Board) proposal for the Mandatory Conservation Proposed Regulatory Framework released April 7, 2015.

The California State Water Board has requested public comment on the proposed restrictions being considered in order to implement the Governor's Executive Order B-29-15 issued on April 1, 2015.

First, we recognize the severity of the task being asked by the Governor upon the Water Board and certainly the impacts the long gated drought is having on our Golden State. We have been doing our effort to obtain not only conservation but more importantly meaningful and sustained conservation since 2008, when we implemented our Phase 1 restrictions which have remained in place every year.

We believe that process has resulted in sustained reductions of nearly 12%. During that period, residential use has been reduced by over 16%. Admittedly, we have not followed a measuring stick of month-to-month, as we feel the variables that impact water usage by customers force erratic swings that shift focus from whether conservation is actually happening to the headline that we failed or succeeded each month.

Using a multi-year measuring period to smooth out the unpredictable nature of production numbers is critical for a sustained conservation picture. A shorter time period comparison does not factor in major water incidents outside the control of all water purveyors, such as UCLA's line break or the natural disasters of the Colby Fire in Glendora. Doing month to month comparisons presents an inaccurate picture when trying to compare a wet month or cool month one year to a dry or hot month the next year for example.

We have used a three-year annual average of pre-Phase 1 compared to the last three year annual average. That data shows our community used about 4.33 billion gallons on average annually prior to 2008 Phase 1. In the 2012-14 annual average usage was only 3.812 billion. I am attaching a list of projects we have completed as a City where we have partnered with our customers. We hope this shows we have done much more than "window dressing" to this very serious issue. In Glendora over 2 million sq. feet of turf removal has occurred; yet most of it occurred in non-residential areas which will not be credited to us under the draft regulatory framework.

Our concern with the draft regulatory framework is that it is a one-size fits all approach which puts pressure unevenly across the State's communities, and could be easily manipulated to achieve requirement without real conservation. It also puts additional pressure on a small segment of users (residential) when the focus should and needs to be water management as a whole.

Our first question is why the effort to focus on residential use by using the R-GPCD? Should not the water purveyor be required to reduce overall consumption? That way, the water purveyor can use more tools to see how best to achieve the quickest solution that meets both the needs for consumption and the customers. In our case, the top 40 users out of 13,377 customers are made up of 16% institutional, 40% commercial and 44% multi-family complexes. They collectively account for 15% of total water consumption. We believe for us it is better to continue working with these users to achieve more savings quicker rather than working with nearly 11,000 single family residences ("SFR"). Our effort does not exclude or diminish the need to work with SFR, yet with just 9 months to meet the Executive Order we need to focus with clarity and quickness, using solutions to permanently sustain the results.

The formula used to arrive at R-GPCD has been flawed since its inception. We believe most purveyors don't have the documentation to know exactly how many residential customers they have or how much they are using. The billing systems for most water suppliers are based on a meter size not use (residential; commercial and industrial). We question how many water suppliers can provide supporting documentation to support all the data filed to date. As an example, the City of Azusa reports to have 110,000 residential users but the California Department of Finance reports their entire population at 48,385 for 2014.

Also, we can see the percentage that purveyors report being attributed to residential consumption varying in a wide range from 51% to 85% in just the San Gabriel Valley. I know our city was estimated at 85% but that was only guesswork. We are now engaged in retrieving billing statements for 13,377 customers and developing information, especially in light of the additional reporting requirements the Board is proposing.

The R-GPCD is flawed in that many variables significantly impact the wide diversity of the communities within our State. For instance, while all regions are experiencing the drought, some are more impacted than others, driving the demand for water above normal limits. The City of San Francisco, for example, is experiencing 62 percent of normal precipitation, so customers' outdoor watering habits are benefited by Mother Nature more than say Los Angeles which is at 52 percent according to NOAA.

We understand that various studies indicate that outdoor watering by urban residents usually accounts for 70% of the potable water usage. So core urban areas where high density housing is the norm and the use of hardscape features are more prominent as compared to suburban communities where the SFR is the primary feature are at significant advantage.

Finally, the direction being taken is unfairly putting the burden upon the urban resident. Study presented at the Bay Area Science Forum ("BASF") in 2008 indicated that distribution of water in California during the average year was as follows:

- 42% of all potable water is used by agriculture - Agricultural water use is important in California as the State produces over 250 different crops and leads the nation in production of 75 commodities
- 11% Urban uses - water uses include everything from personal use—such as drinking, watering the garden, and bathing, to industrial use.
- 47% Environmental Water - Environmental water includes wild and scenic river flows, required Delta outflow, and wetland water, and is crucial for maintaining intact marine ecosystems.

If these distribution numbers are correct, does reducing a global 3% out of the entire water system really begin to address the true impacts of water management in California? Does not California need to see the bigger picture and cut through the decades of regional politics and myths to better manage the precious resource that water is for us in public health, safety and its economic value?

This course of action seems to further cement the myth that urban reduction is going to really make an impact rather than stepping forward to manage water more effectively and efficiently.

City of Glendora Suggestions:

- That Water purveyors be given global consumption reduction to be achieved. Leave it to the purveyor to find the solutions best fitting the needs of their service area. We would urge no reduction be greater than the original 20% proposed by the Governor State of Emergency declaration January 17, 2014.

- That if an “interim” need to use the R-GPCD is needed that water purveyors be allowed to present evidence to alter the assumptions that may have been reported in the September 2014 report in terms of residential accounts and consumption within the next 60-days of adoption.
- That the State Water Board seek counsel as to the impact by Proposition 218 and Proposition 26 upon local government purveyors prior to discussions on rate structure elements within the Governor’s Executive Order. Setting rates based on property type and/or rates unrelated to “water costs” may trigger the need for 2/3 voter approval.
- That the State Water Board encourage the Governor to suspend, as he did for State programs and contracts, parts of Public Resources Code and Public Contract Code to allow the quickest implementation of conservation program. Being held up by 30, 60 or even 90 days due to technical requirements is counter to Emergency Nature the State has declared.
- The State Water Board partnering with local agencies to provide best practice information to ensure a true partnership between the State and purveyors.
- That the State Water Board be a voice in recognizing that the State needs to take a stronger leadership and action in developing a truly comprehensive water management policy. There are going to be global elements that need to be changed and altered because the burden of this solution cannot fall primarily upon urban users.

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

Sincerely,

CITY OF GLENDORA



Chris Jeffers
City Manager

Encl.

C: Glendora City Council
Joe A. Gonsalves & Son

City of Glendora Water Conservation (Partial List)

Glendora Community -

Water Consumption:

3-Year Pre-Phase 1 Annual Average – 4,331,726,886 gallons

Last 3-year Annual Average – 3,811,919,045 gallons

Glendora Rebate Program*:

2009 – 2014 1,835 Customers Participated

*This excludes MWD/TVWD program

Number of Efficient Water Devices Installed*:

2009- 2014 20,493 devices installed

*This excludes MWD/TVWD program

Total City Rebate Dollars Spent*:

2009 – 2014 \$337,405

*This excludes MWD/TVWD

City of Glendora Projects –

Median Turf Removal:

2012 – Removed 17,805 square Feet

2015 – Removed 1,605 Square Feet

City Facilities Turf Removal:

2011 – 12,120 Square Feet (Art Cook Park)

2012 – 10,900 Square Feet (Willow Springs Park)

2013 – 14,000 Square Feet (South Hills Park)

2014 – 10,000 Square Feet (Teen Center)

2015 - 5,600 Square Feet (Historical Museum)

City Facility Turf Removal Projects Underway:

2015 – 70,000 Square Feet (Pompei Sports Park)

2015 – 22,000 Square Feet (Gladstone Passive Park)

2015 - 3,610 Square Feet (Big Tree Expansion)

Water Conservation Gardens:

Gladstone Park

Art Cook Park

Civic Center Plaza

Gladstone Passive Park (in 2015)

Total City Expenditure 2009 – 2014: \$1.6 million