

Mark N. Kinsey
GENERAL MANAGER

April 22, 2015

Jessica Bean, Engineering Geologist
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814
Delivered via Email: jessica.bean@waterboards.ca.gov

Proposed Draft Drought Emergency Conservation Regulations

Dear Ms. Bean:

Monte Vista Water District (District) respectfully submits the following comments in response to the proposed draft Drought Emergency Conservation Regulations published by the State Water Resources Control Board (State Board) on Saturday, April 18, 2015. This letter follows up and references our previous letter submitted on April 13, 2015.

Monte Vista Water District supports the Governor's call for a mandatory 25% reduction in potable urban water use with recognition of past conservation achievements. As detailed in our April 13 letter, the District's customers have reduced their demand by 20-25% over the past decade and, we believe, are up to the challenge of achieving an additional 25% reduction as required by the Governor's Order.

In our April 13 letter, the District expressed significant reservations regarding the use of Residential Gallons Per Capita Per Day (R-GPCD) as a metric for apportioning water supplier reductions. It is our belief that R-GPCD is not consistent with the Governor's Order ("relative per capita water usage," not "relative *residential* per capita water usage"), has not been fully vetted as a standardized metric to compare agencies' relative past conservation success, and relies on inconsistent agency data.

In place of R-GPCD, the District continues to recommend that the State Board consider using Gallons Per Capita Per Day (GPCD). This metric has been fully vetted and provides a comprehensive focus on all water agency demands. As the State Board's Fact Sheet for the proposed regulations states (pg. 3, emphasis added): "There are no specific use reduction targets for commercial, industrial, and institutional users served by urban and all other water suppliers. Water suppliers will decide how to meet their conservation standard through reductions *from both residential and non-residential users.*" Using a more comprehensive GPCD baseline for establishing water use reduction targets, rather than an R-GPCD focused on the residential sector, is more consistent with State Board's recommended comprehensive approach to achieve savings.

Nevertheless, the new draft regulations continue to use R-GPCD to compare agencies' relative past conservation success. While the District remains concerned with the R-GPCD metric and its use, we have also reviewed District data provided to the State Board to ensure its accuracy when used as a comparative metric with other agencies. Since October 2014, the District has used the recommended methodologies provided by the State Board in estimating its service area population and residential use percentage. Unfortunately, we have found that following these methods result in artificially low population estimates and artificially high estimates of residential use. The District will be submitting revised population and residential percentage estimates, with detailed explanations and data, through the State Board's online reporting tool. We apologize for the need to resubmit this data.

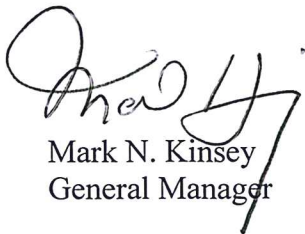
The District recommends that the State Board consider developing more standardized procedures for estimating service area population and residential use. Our review of statewide reporting data showed a wide disparity of approaches in developing these estimates. We further recommend that such standardized procedures be developed in consultation with the Department of Water Resources and the Urban Stakeholder Committee, as they are currently in process of developing similar procedures for use by water agencies' when writing our 2015 Urban Water Management Plans.

Finally, the District recommends that the State Board reconsider its approach of using three months of summer use in 2014 as the baseline for assigning agencies to conservation standard tiers. Usage during the summer months can be highly variable, depending on weather and temperature, and may not accurately reflect past conservation performance by an agency's water users. Additionally, the District, like many agencies, bills bimonthly and therefore has difficulty matching residential consumption with production on a monthly basis. Using an annualized baseline – such as calendar year 2014 – would more accurately reflect agency data and past performance.

Once again, thank you for considering our concerns as you finalize these emergency regulations. If you or your staff have any questions or require further information, please contact Justin Scott-Coe, Public Affairs Director, at (909) 267-2116 or by email at jscottcoe@mvwd.org.

Sincerely,

Monte Vista Water District



Mark N. Kinsey
General Manager

cc: Monte Vista Water District Board of Directors
The Honorable Assemblymember Freddie Rodriguez, California State Assembly
The Honorable Senator Connie M. Leyva, California State Senate
The Honorable Senator Mike Morrell, California State Senate
The Honorable Senator Bob Huff, California State Senate