

RIO LINDA / ELVERTA COMMUNITY WATER DISTRICT

P.O. BOX 400 • 730 L STREET RIO LINDA, CALIFORNIA 95673

Phone: (916) 991-1000 • Fax: (916) 991-6616 www.rlecwd.com

April 22, 2015

Jessica Bean Water Boards

Re: Proposed Framework for Mandatory Conservation measures.

Dear Ms. Bean,

The Rio Linda/Elverta Community Water District appreciates the opportunity to comments on the Board's proposed regulatory framework for implementing the statewide 25% reduction mandated by the Governor's April 1, 2015 Executive Order.

I have two comments. My first comment is on using the R-GPCD as the indicator of water used in a residence. I have attached an example of what happens when using the R-GPCD which includes unaccounted for water used in fires, street sweeping, main line maintenance etc. versus the actual usage taken from water meters. As you can see the actual residential usage is less than the R-GPCD. This is because the unaccounted for water used by others is included in the R-GPCD.

I would like to Board to consider allowing a provision for Districts that are fully metered to use actual meter readings instead of the R-GPCD. For the following reasons:

It is an actual measure of the water used by residents,

The residents can individually be held accountable for water used over the State mandated amount.

These numbers are already reported to the State on a monthly basis in our annual reports,

My second comment is regarding properties with mixed use. There is currently no provision for determining how to calculate water usage for a property that has for example a restaurant downstairs and a residence above or a strawberry farm on the same parcel as a home. We bill by meter size not by type of use. Some guidance on how to determine the portion of water that is residential would be appreciated by many.

Thank you for your consideration of this comment, Sincerely,

Mary Henrici

Mary Henrici General Manager Rio Linda, Elverta CWD

a
=
=
₽
≂
ш
8
ب
~
<
5
_
Ψ
٠,
=
O
_

period 10936 117 Nov 20, 2013 - Jan 20, 2014 - Mar. 20, 2014 17,625,488 10936 61 107.37 83% 10936 99.2 Jan 20, 2014 - Mar. 20, 2014 89,379,268 10936 61 107.37 83% 10936 124 Sandario	Current SWRCB Formula	rmula			GPCD Using acut Using actual 2014 Si	GPCD Using acutal billed Residential usage from Meters for period ig actual 2014 Single Family and Multi Family Residential (anartme	tial usage from Julti Family F	m Meters Pesidentia	for period	nts)
% Residential Population RGPCD Nov.20,2013-Jan 20,2014 71,625,488 Population Days RGPCD 92 10936 94.9 Inn 20, 2014- Mar. 20, 2014 71,625,488 10936 61 107.37 91 10936 94.9 Inn 20, 2014- Mar. 20, 2014 S9,370,256 10936 60 90.48 91 10936 124 March 20, 2014- May 20, 2014 89,379,268 10936 61 133.98 86 10936 286 May 20, 2014- May 20, 2014 172,672,808 10936 61 258.84 86 10936 257 May 20, 2014- May 20, 2014 154,004,972 10936 61 168.71 85 10936 169.77 July 20, 2014 - Sept 20, 2014 112,546,324 10936 61 168.71 91 10936 10936 10036 10036 60,577 Sept. 20, 2014 - May 20, 2014 112,546,324 10936 61 90.92 83 10936 10036 10036 10036 10036 61						iigic i aiiiiiy aiid iy	nati rannay i	יבאתבוותם	ı (apaı une	iiLS) Actual
Population RGPCD Billed Res Usage Population Days RGPCD 10936 117 Nov 20, 2013 - Jan 20, 2014 71,625,488 10936 61 107.37 10936 94.9 Jan 20, 2014 - Mar. 20, 2014 S9,370,256 10936 60 90.48 10936 209 March 20, 2014 - Mar. 20, 2014 89,379,268 10936 61 133.98 10936 224 May 20, 2014 - July 20, 2014 172,672,808 10936 61 258.84 10936 225.02 July 20, 2014 - Sept 20, 2014 154,004,972 10936 61 168.71 10936 10936 1003 Sept. 20, 2014 - Nov. 20, 2014 112,546,324 10936 61 168.71 Population RGPCD RGPCD Nov. 20, 2014 - Jan. 20, 2015 80,552,328 10936 61 90.92 10936 92.51 Jan. 20, 2014 - Mar. 20, 2015 54,349,680 10936 61 90.92		2013 same period								2014 % Res.
92 10936 117 Nov 20, 2013 - Jan 20, 2014 71,625,488 10936 61 107.37 92 10936 94.9 Jan 20, 2014 - Mar. 20, 2014 59,370,256 10936 60 90.48 91 10936 124 Jan 20, 2014 - Mar. 20, 2014 89,379,268 10936 61 133.98 86 10936 294 March 20, 2014 - July 20, 2014 172,672,808 10936 61 258.84 86 10936 257 July 20, 2014 - Sept 20, 2014 172,672,808 10936 61 258.84 85 10936 225.02 July 20, 2014 - Sept 20, 2014 112,546,324 10936 61 168.71 91 10936 108 Sept 20, 2014 - Nov. 20, 2014 112,546,324 10936 61 168.71 85 10936 101.2 Nov. 20, 2014 - Jan. 20, 2015 8116,646,324 10936 61 90.92 83 10936 101.2 Nov. 20, 2014 - Jan. 20, 2015 60,652,328 10936 61 90.92	Total Production	% Residential	Population	RGPCD		Billed Res Usage	Population	Days	RGPCD	for period
92 10936 94.9 Jan 20, 2014 - Mar. 20, 2014 59,370,256 10936 60 90.48 91 10936 124 March 20, 2014 - May 20, 2014 89,379,268 10936 61 133.98 86 10936 236 March 20, 2014 - July 20, 2014 172,672,808 10936 61 258.84 86 10936 225.02 July 20, 2014 - Sept 20, 2014 172,672,808 10936 61 258.84 85 10936 225.02 July 20, 2014 - Sept 20, 2014 154,004,972 10936 61 168.71 91 10936 102.50 July 20, 2014 - Nov. 20, 2014 112,546,324 10936 61 168.71 85 10936 10036 101.2 Sept. 20, 2014 - Nov. 20, 2014 112,546,324 10936 61 90.92 83 10936 89.31 Nov. 20, 2014 - Jan. 20, 2015 60,652,328 10936 61 90.92 83 10936 92.51 An. 20, 2014 - Mar. 20, 2015 84,349,680 10936 61	43,223,720	92	10936	117	Nov 20, 2013 - Jan 20, 2014	71,625,488	10936	61	107.37	83%
91 10936 99.2 Jan 20, 2014 - Mar. 20, 2014 59,370,256 10936 60 90.48 91 10936 124 March 20, 2014 - May 20, 2014 89,379,268 10936 61 133.98 86 10936 228 May 20, 2014 - July 20, 2014 172,672,808 10936 61 258.84 85 10936 225.02 July 20, 2014 - Sept 20, 2014 154,004,972 10936 61 258.84 91 10936 169.77 Sept 20, 2014 - Nov. 20, 2014 112,546,324 10936 61 168.71 2014 same period * Residential Population RGPCD RGPCD Nov. 20, 2014 - July 20, 2015 60,652,328 10936 61 90.92 83 10936 92.51 Ann. 20, 2014 - July 20, 2015 60,652,328 10936 61 90.92 83 10936 114 Jan. 20, 2014 - July 20, 2015 60,652,328 10936 61 90.92	31,593,408	92	10936	94.9						
91 10936 124 March 20, 2014 - May 20, 2014 89,379,268 10936 61 133.98 86 10936 286 March 20, 2014 - July 20, 2014 172,672,808 10936 61 258.84 86 10936 257 July 20, 2014 - Sept 20, 2014 - Sept 20, 2014 - Sept 20, 2014 - Sept 20, 2014 - Nov. 20, 2014 154,004,972 10936 62 257.14 85 10936 169.77 Sept 20, 2014 - Nov. 20, 2014 112,546,324 10936 61 168.71 2014 same period Residential Population RGPCD Nov. 20, 2014 - Jan. 20, 2015 112,546,324 10936 61 168.71 2014 same period Residential Population RGPCD Nov. 20, 2014 - Jan. 20, 2015 60,652,328 10936 61 90.92 83 10936 92.51 Jan. 20, 2014 - Mar. 20, 2015 54,349,680 10936 60 82,383	36,983,432	91	10936	99.2	Jan 20, 2014 - Mar. 20, 2014	59,370,256	10936	09	90.48	95%
86 10936 209 March 20, 2014 - May 20, 2014 89,379,268 10936 61 133.98 86 10936 286 May 20, 2014 - July 20, 2014 172,672,808 10936 61 258.84 85 10936 257.0 July 20, 2014 - Sept 20, 2014 154,004,972 10936 62 277.14 85 10936 169.77 Sept. 20, 2014 - Nov. 20, 2014 112,546,324 10936 61 168.71 91 10936 101.2 Sept. 20, 2014 - Nov. 20, 2014 112,546,324 10936 61 168.71 2014 same period Residential Population RGPCD Nov. 20, 2014 - Jan. 20, 2015 60,655,328 10936 61 90.92 83 10936 92.51 Jan. 20, 2014 - Mar. 20, 2015 54,349,680 10936 61 90.92	45,031,976	91	10936	124						
86 10936 286 86 10936 294 May 20, 2014 - July 20, 2014 172,672,808 10936 61 258.84 85 10936 257 July 20, 2014 - Sept 20, 2014 154,004,972 10936 62 227.14 85 10936 169.77 July 20, 2014 - Nov. 20, 2014 112,546,324 10936 62 227.14 91 10936 101.2 Sept. 20, 2014 - Nov. 20, 2014 112,546,324 10936 61 168.71 2014 same period *Residential Population RGPCD Nov. 20, 2014 - Jan. 20, 2015 60,652,328 10936 61 90.92 83 10936 92.51 Jan. 20, 2014 - Mar. 20, 2015 54,349,680 10936 61 90.92	82,402,968	98	10936	506	March 20, 2014 - May 20, 2014	89,379,268	10936	61	133.98	%68
86 10936 294 May 20, 2014 - July 20, 2014 172,672,808 10936 61 258.84 86 10936 257.0 July 20, 2014 - Sept 20, 2014 154,004,972 10936 62 227.14 85 10936 108 Sept. 20, 2014 - Nov. 20, 2014 112,546,324 10936 61 168.71 2014 same period 10936 101.2 Amort 20, 2014 - Jan. 20, 2015 Billed Res Usage Population RGPCD RGPCD RGPCD Population RGPCD	109,268,824	98	10936	286						
86 10936 257. July 20, 2014 - Sept 20, 2014 154,004,972 10936 62 227.14 85 10936 225.02 July 20, 2014 - Sept 20, 2014 112,546,324 10936 61 168.71 91 10936 101.2 Sept. 20, 2014 - Nov. 20, 2014 - Nov. 20, 2014 - Nov. 20, 2014 - Jan. 20, 2015 112,546,324 10936 61 168.71 2014 same period R Residential Population RGPCD RGPCD RGPCD RGPCD % Residential Population RGPCD RGPCD RGPCD Population RGPCD Population RGPCD % Residential Population RGPCD RGPCD RGPCD Population RGPCD RGPCD % Residential Population RGPCD RGPCD RGPCD RGPCD RGPCD RGPCD % Rasidential RGPCD R	115,965,570	98	10936	294	May 20, 2014 - July 20, 2014	172,672,808	10936	61	258.84	87%
85 10936 225.02 July 20, 2014 - Sept 20, 2014 154,004,972 10936 62 227.14 91 10936 169.77 Sept. 20, 2014 - Nov. 20, 2014 112,546,324 10936 61 168.71 91 10936 101.2 Sept. 20, 2014 - Nov. 20, 2014 - Nov. 20, 2014 - Jan. 20, 2015 Billed Res Usage Population Days RGPCD 83 10936 89.31 Nov. 20, 2014 - Jan. 20, 2015 60,652,328 10936 61 90.92 83 10936 92.51 Jan. 20, 2014 - Mar. 20, 2015 54,349,680 10936 60 82.83	101,389,176	86	10936	257						
85 10936 169.77 Sept. 20, 2014 - Nov. 20, 2014 112,546,324 10936 61 168.71 91 10936 101.2 Sept. 20, 2014 - Nov. 20, 2014 - Jan. 20, 2015 112,546,324 10936 61 168.71 2014 same period RGPCD RGPCD RIIIled Res Usage Population Days RGPCD 83 10936 89.31 Nov. 20, 2014 - Jan. 20, 2015 60,652,328 10936 61 90.92 83 10936 92.51 Jan. 20, 2014 - Mar. 20, 2015 54,349,680 10936 60 82.83	85,940,496	85	10936	225.02	July 20, 2014 - Sept 20, 2014	154,004,972	10936	62	227.14	86%
91 10936 108 Sept. 20, 2014 - Nov. 20, 2014 112,546,324 10936 61 168.71 2014 same period * Residential Population RGPCD Billed Res Usage Population Days RGPCD 83 10936 89.31 Nov. 20, 2014 - Jan. 20, 2015 60,652,328 10936 61 90.92 83 10936 92.51 Jan. 20, 2014 - Mar. 20, 2015 54,349,680 10936 60 82.83	67,003,567	85	10936	169.77						
91 10936 101.2 2014 same period % Residential Population RGPCD 83 10936 89.31 Nov. 20, 2014 - Jan. 20, 2015 60,652,328 10936 61 90.92 83 10936 92.51 92 10936 114 Jan. 20, 2015 54,349,680 10936 60 82.83	42,000,000	91	10936	108	Sept. 20, 2014 - Nov. 20, 2014	112,546,324	10936	61	168.71	86%
2014 same period % Residential Population RGPCD 83 10936 89.31 Nov. 20, 2014 - Jan. 20, 2015 60,652,328 10936 61 90.92 83 10936 92.51 92 10936 114 Jan. 20, 2015 54,349,680 10936 60 82.83	37,417,704	91	10936	101.2						
2014 same period % Residential Population RGPCD 83 10936 89.31 Nov. 20, 2014 - Jan. 20, 2015 60,652,328 10936 61 90.92 83 10936 92.51 92 10936 114 Jan. 20, 2015 54,349,680 10936 60 82.83										Actual
% Residential Population RGPCD RGPCD <td></td> <td>2014 same period</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>2015 % Res.</td>		2014 same period								2015 % Res.
83 10936 89.31 Nov. 20, 2014 - Jan. 20, 2015 60,652,328 10936 61 90.92 83 10936 92.51 Jan. 20, 2014 - Mar. 20, 2015 54,349,680 10936 60 82.83	Total Production	% Residential	Population	RGPCD		Billed Res Usage	Population	Days	RGPCD	for period
10936 92.51 10936 114 Jan. 20, 2014 - Mar. 20, 2015 54,349,680 10936 60 82.83	36,479,536	83	10936	89.31	Nov. 20, 2014 - Jan. 20, 2015	60,652,328	10936	61	90.92	92%
10936 114 Jan. 20, 2014 - Mar. 20, 2015 54,349,680 10936 60 82.83	34,130,442	83	10936	92.51						
	42,007,355	92	10936	114	Jan. 20, 2014 - Mar. 20, 2015	54,349,680	10936	09	82.83	%68