



# Central Basin

Municipal Water District

December 2, 2015



6252 Telegraph Road  
Commerce, CA 90040-2512

Phone: 323.201.5500  
Fax: 323.201.5550  
[www.centralbasin.org](http://www.centralbasin.org)

The Honorable Felicia Marcus and Members of the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

Subject: Comment Letter - Urban Water Conservation Workshop

### Board of Directors

#### Division I

James B. Roybal

#### Division II

Robert Apodaca

#### Division III

Arturo Chacon

#### Division IV

Leticia Vasquez

#### Division V

Phillip D. Hawkins

Dear Chair Marcus and Members of the Board:

Thank you for the opportunity to provide comments on the potential extension and modifications of the existing Emergency Regulation for Statewide Urban Water Conservation. Central Basin Municipal Water District (Central Basin) strongly supports the Governor's call to reduce water use in response to the historic drought.

Central Basin is a public agency that wholesales imported water to cities, special districts, mutual water companies, investor-owned utilities and private water companies by serving a population of more than 2 million people living within 24 cities and unincorporated areas in southeast Los Angeles County. Central Basin also provides the region with recycled water for municipal, commercial, and industrial use. More than 40 percent of its service area is considered as disadvantaged communities.

Central Basin has been a leader in water conservation with a strong history of aggressively saving water through long-term investments in conservation. Central Basin is proud that 24 of our retail member agencies are currently as a whole exceeding the required conservation requirement for our service area.

Our comments are organized according to the three areas you requested input.

1. Elements of the existing regulation that should be modified:

We are aware of the proposals that have been submitted by others, including the Association of California Water Agencies (ACWA), and we generally support these proposals. Specifically, we are very supportive of the proposal to provide a regional compliance option, as was provided with

### Serving the Cities of

Artesia	La Mirada
Bell	Lynwood
Bellflower	Maywood
Bell Gardens	Montebello
Carson	Monterey Park
Cerritos	Norwalk
Commerce	Paramount
Compton	Pico Rivera
Cudahy	Santa Fe Springs
Downey	Signal Hill
East Los Angeles	South Gate
Florence-Graham	Walnut Park
Hawaiian Gardens	Whittier
Huntington Park	Willowbrook
La Habra Heights	Vernon
Lakewood	

SB X7-7. We are not opposed to the other proposals submitted by ACWA, UNLESS they would result in increased conservation requirements for other water purveyors. If that were to occur, some of our member agencies may be harmed by these proposals, and we would appreciate the opportunity to have further dialogue about any changes which might result in harm to our member agencies.

2. Collection of additional data, if any:

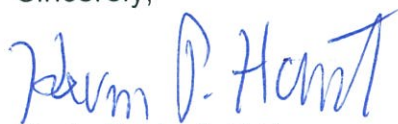
We agree with ACWA that there is no need to collect additional data.

3. Accounting for precipitation after January 2016:

The State Board faces a difficult task of making a water conservation decision in January, with much of our winter still ahead of us. However, since more than 2/3 of urban Californians receive a portion of their water supply from the State Water Project (SWP), we suggest that the State Board could tier its conservation requirement off of the SWP water supply allocation. If the SWP allocation hopefully increases as we progress through the winter, the conservation requirement could be reduced. The final conservation requirement could be established based on the SWP allocation in April, which is usually the final allocation.

Thank you for your consideration of our comments. If you have any questions, please do not hesitate to contact me at (323) 201-5548 or via email at [kevinh@centralbasin.org](mailto:kevinh@centralbasin.org).

Sincerely,



Kevin P. Hunt, P.E.  
General Manager

cc: Central Basin MWD Board of Directors  
Central Basin MWD Member Agencies