

DEPARTMENT OF WATER



November 30, 2015

Service, Quality, Community

**Joe Serna Jr. - CalEPA Headquarters Building
Coastal Hearing Room
1001 I Street, Second Floor
Sacramento, CA 95814**

Comment Letter – Urban Water Conservation Workshop

Dear Mr. Serna,

As requested in the Notice of Public Workshop the Big Bear Lake Department of Water (BBLDWP) wishes to share our input on the following points.

1. What elements of the existing Emergency Regulation, if any, should be modified in an extended Emergency Regulation?

The current regulation requires a percentage reduction based upon the residential gallons per capita per day (R-GPCD) in the summer of 2014. The California 20 x 2020 plan set a goal of 154 GPCD. For agencies such as ours, we still must reduce our use by 16% despite having a very low R-GPCD. Our R-GPCD for calendar year 2015 is now below 56 R-GPCD. If the Emergency Resolution is extended we believe it prudent and fair that if an agency has an R-GPCD that is already well below the 154-RGPCD goal, they be excluded, or at least moved to the 4% tier.

In addition, the existing Regulation does not take the health of the groundwater basin into account, even for agencies such as ours that do not rely on any outside sources of water. Our annual production is well below our basin's current perennial yield. Even at build-out, we do not believe we will reach our maximum perennial yield, especially as per capita use continues to drop and new construction continues to become increasingly efficient. BBLDWP requests the State Water Board consider revising Section 865 (c) (2) to allow water suppliers whose supplies include groundwater or surface water, supplies are not imported from outside the water supplier's hydrologic region, and can demonstrate that they have a minimum of four years' reserved supply available be allowed to submit a request to the Executive Director for approval to be placed in the 4% reserve tier.

Water providers should also be judged based upon the progress made June 2015-February 2016. Those who meet or exceed their goals and who also have a low R-GPCD should be excluded from the conservation mandates or at least be prescribed a 4% tier. For those who meet their goal, but still have a high R-GPCD (over 154), should be considered for a lower tier. Those who fail in both regards should remain where they are, be coached and guided in additional steps they can take.

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2. What additional data, if any, should the State Water Board be collecting through the Emergency Regulation and how would it be used?

The State may want to consider collecting numbers for the monthly or annual budget for conservation at each agency, especially as compared to their population. That data could be compared to their success in conservation. Granted, there are multiple factors that account for conservation that cannot be attributed to funding, but it would be useful to know whether there is a correlation and how much the drought is costing water providers. As part of that information it would be interesting to also see lost revenue as a result of water use reductions.

3. How should the State Water Board account for precipitation after January 2016 in its implementation of any extension of the Emergency Regulation?

Any precipitation that could make a meaningful difference in the water tables should be taken into consideration. El Nino is predicted to make the most measurable impact between January and April. Once actual precipitation quantities are measured, areas received above average precipitation should be able to request a lower conservation tier.

In closing, we understand that it will take more than just one good El Nino year to begin to recover from the prolonged drought. We understand that we are in a small number of water providers who have both a stable and isolated groundwater supply and low R-GPCD. However, every water provider faces special circumstances. We applaud the Department of Water Resources for the work they put into this regulation on such short notice in 2015, however, if the regulation continues more circumstances need to be considered resulting in a possible reassignment of conservation tiers. Thank you for your consideration.

Sincerely,

Reginald A. Lamson, PE LS

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