

STATE CAPITOL  
P.O. BOX 942849  
SACRAMENTO, CA 94249-0075  
(916) 319-2075  
FAX (916) 319-2175

DISTRICT OFFICE  
350 W. 5TH AVENUE, SUITE 110  
ESCONDIDO, CA 92025  
(760) 480-7570  
FAX (760) 480-7516

E-MAIL  
Assemblymember.Waldron@assembly.ca.gov

# Assembly California Legislature



**MARIE WALDRON**  
REPUBLICAN FLOOR LEADER  
ASSEMBLYMEMBER, SEVENTY-FIFTH DISTRICT

COMMITTEES  
VICE CHAIR: PUBLIC EMPLOYEES,  
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GOVERNMENTAL ORGANIZATION  
LOCAL GOVERNMENT  
HEALTH  
RULES

April 22, 2015

Jessica Bean  
STATE WATER RESOURCES CONTROL BOARD  
Post Office Box 100  
Sacramento, CA 95812-0100

Sent via Email to: [Jessica.Bean@waterboards.ca.gov](mailto:Jessica.Bean@waterboards.ca.gov)

**SUBJECT: CONCERNS WITH PROPOSED REGULATORY FRAMEWORK FOR  
MANDATORY CONSERVATION (AS RELEASED APRIL 18, 2015)**

Dear Ms. Bean:

I appreciate the opportunity to provide input regarding the Draft Regulations implementing the recently mandated 25% Conservation Standard. I have long been involved in water conservation issues at the local and state levels and I applaud the actions being taken to deal with this ongoing crisis.

While the modifications made to the April 18 proposed framework address some of the concerns raised by stakeholders and by the public, these revisions still continue to apply a simple method to apportion urban supplier reductions, raising further concerns about inequities and implementation.

Any evaluation based on average monthly R-GPCD used in three of the driest months of the year does not tell the whole story with regards to water use and whether an area's water use is efficient and reasonable. While the attractiveness of a model based on a three month R-GPCD average is understandable, by ignoring additional factors the draft regulations will result in an inequitable apportionment of water use reductions for many agencies and cities.

Over many years, water agencies have taken significant steps to encourage water use efficiency and the wise use of water, including the implementation of innovative conservation measures and recycled water development. The past efforts have allowed agencies to achieve dramatic reductions in water usage; however, they have also resulted in significant demand hardening, which makes achieving substantial new reductions in water savings during the current drought more challenging. Despite this challenge, agencies have shown a strong commitment toward seeking greater water efficiency and conservation within their service areas during this drought and well into the future.

Please consider the following information during your deliberations about this important issue:

1. **Use long-term average GPCD to apportion reductions:** Focusing on peak water use months inequitably penalizes agencies in drier and hotter areas of the state. It also does not account for opportunities to improve indoor efficiencies, as it does not capture those inefficiencies which show up only in R-GPCD calculations for cooler months. Due to high variability in month-over-month water demands across the state, the State Board should use a nine-month average of R-GPCD and State submitted GPCD data from 20x2020 reporting to the Department of Water Resources.
2. **Continue to recognize the effectiveness and impact of Allocation-based tiered rate structures:** As previously communicated, allocation based tiered rates send a strong price signal encouraging customers to efficiently use water. To develop allocation based tiered rates, a significant amount of data is collected to set individualized budgets. This data includes persons per household and information about irrigated landscape area that can be used to set efficiency targets. I encourage the State Board to use a performance-based efficiency standard, which is estimated at 15%, for calculating the targets for agencies with allocation-based rate structures or those that transition to them during the reporting period.

The State Board should recognize the strides that have been made over many years to reduce water demands prior to the Governor's declaration. I respectfully urge consideration of the suggestions detailed in this letter as we all work together to address the challenges we face during this crisis.

Thank you for your time and consideration,



Marie Waldron  
Assemblymember, 75<sup>th</sup> District