

commentletters

From: Bruce Carleton <bcarleton@yorba-linda.org>
Sent: Wednesday, June 17, 2015 12:04 PM
To: commentletters
Subject: Comment Letter: Conservation Pricing



To the State Water Resources Control Board:

Regarding the implementation of conservation-based water pricing, I am in total agreement that it is the right approach. Unfortunately many water purveyors have clearly been caught unprepared as though this day would never come. Now that they have been pushed into a corner they are imposing poorly thought out tiered rate structures that are totally arbitrary and logically indefensible. Case in point, the Yorba Linda Water District.

Their tiered rate structure is based on the most arbitrary foundation I can imagine. For **all** landscape service connections an allotment of 115 ccf per month was arbitrarily established. It doesn't matter if it is a small strip mall or a 2 acre open-space trail area; every service gets the same quota of water regardless of the size. So someone who has a small commercial center can continue to irrigate however they want without worry of ever exceeding the quota and individuals like me will be forced to essentially abandon vast portions of my areas of responsibility (municipally managed parkways and trail systems) to have any chance to avoid **top tier** penalty dollars.

While cutting 36% will be a challenge, for many areas under my care the actual needed reduction to meet this arbitrary quota would be greater than 80%. All I ask is that a reasonable quota of water be established for each service area based on the size of the irrigated area, not a one size fits all that is issued just to get a program in place quickly. It is estimated for my operational area **even if we meet the 36% reduction on every site, my department would still sustain annual penalty dollars exceeding \$150,000**. Needless to say this is a gaping hole to fill in a budget that has been steadily shrinking as it is. This draconian measure has to be revisited and **there is a better way**.

The science behind establishing a reasonable water allotment has been implemented by other purveyors (Irvine Ranch Water District being the pioneer in the Orange County region) is fully developed so there is no valid excuse not to adapt that conservation program to other purveyors. It is demanding, but achievable with some work. **The current Yorba Linda Water District program is capricious and leaves its customers with a sense of hopelessness** as no matter how carefully a site is managed, it cannot possibly meet the goal. While other consumers can rest comfortably in the knowledge that no matter what they can continue the status quo without fear of retribution as the arbitrary quota is more than generous for them. As a public agency I understand the responsibility to be a leader by managing this resource carefully, but the tier structure being implemented by the Yorba Linda Water District is not geared to reward those who take the time to manage carefully, it only rewards those who have a small enough landscape to avoid the issue and the rest just suffer (job security undermined) through no fault of their own.

Regards,
Bruce Carleton – Assessment District Manager
The City of Yorba Linda