



NEWHALL COUNTY WATER DISTRICT

23780 North Pine Street • P.O. Box 220970 • Santa Clarita, CA 91322-0970
(661) 259-3610 Phone • (661) 259-9673 Fax • email: mail@ncwd.org

Directors: B. J. ATKINS, *President* MARIA GUTZEIT, *Vice President* KATHY COLLEY DANIEL MORTENSEN LYNNE A. PLAMBECK

April 13, 2015

Jessica Bean, Engineering Geologist
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814

Attn: Jessica Bean
Via Email Only

Subject: Comment Letter – Mandatory Conservation Achieving a 25% Statewide Reduction in Potable Urban Water Use Fact Sheet

Dear Ms. Bean:

The Newhall County Water District (NCWD) appreciates the opportunity to provide comments on the State Water Resources Control Board (State Water Board) Mandatory Conservation Fact Sheet. NCWD has been actively engaged in water conservation efforts and has been implementing the required mandatory actions. We understand and appreciate the expedited timeline and pressure the State Board is faced with and we have kept our comments concise. If the State Board has any questions, we can provide additional data and information as needed. To that end, NCWD respectfully submits the following comments:

1. NCWD believes the R-GPCD equation needs to be further explained and defined. We have spoken with several other water suppliers and there are different interpretations of computing R-GPCD.
2. The way the R-GPCD formula is calculated creates an unreasonable and unfair burden on water suppliers with a high single family residential population. The Board should consider revising the formula to more equitably target all customers within a water supplier's service area, including landscaped areas of commercial, industrial, and institutional sectors.
3. The selection of September 2014 as the baseline R-GPCD in assigning tiers is arbitrary and does not recognize water supplier conservation efforts from October 2014 to date. NCWD

recommends the Board use an average R-GPCD from September 2014 - March 2015 as the R-GPCD baseline.

4. The conservation scale should have smaller incremental changes between the tiers. For example, if a supplier is at 55.8 R-GPCD they are required to meet a 20% conservation standard. However, they are only two tenths of an R-GPCD higher than being required to meet a 10% conservation standard.
5. Because of the complexities of production and sales read dates and reporting, the Board should consider a running annual average of conservation to more adequately identify conservation.

NCWD looks forward to continuing to work with the State Water Board to ensure we not only meet short term goals, but also address the development of a framework to discuss the advancement of long term water reliability policy.

Sincerely,
Newhall County Water District



Stephen L. Cole
General Manager