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> DAVID J. COXEY Secretary/Treasurer/General Manager

# **BELLA VISTA WATER DISTRICT**

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April 22, 2015

Delivered by e-mail to: <u>Jessica.Bean@waterboards.ca.gov</u> Jessica Bean, Engineering Geologist State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95814

Subject: Comments on Draft Regulations

Dear Ms. Bean:

The Bella Vista Water District appreciates the opportunity to comment on the draft regulations implementing a 25 percent statewide reduction in potable water use. The District fully recognizes the severity of the ongoing drought and supports the Governor's Executive Order and its key provision to reduce potable urban water usage by 25 percent statewide over the coming months. We appreciate the challenge and effort that Water Board staff have devoted to soliciting input from stakeholders in order to accomplish the objectives in a fair and equitable manner.

Our greatest concern with the draft regulation is the absence of any adjustment for climate and land use despite the very diverse climates that exist across the state from coastal areas to the hot dry interior valleys and desert regions. Climate conditions vary significantly across this great state! Additionally, the northern regions of the state have longer days and receive higher solar radiation that results in higher evaporation and evapotranspiration rates. Although outdoor irrigation is certainly a large component of overall water use, many residents within our District rely on swamp coolers as their primary method of cooling their home with relatively high consumptive use rates. With average temperatures well over 100 degrees throughout the summer months, cooling in the Redding area is not just a luxury, but a necessity. The District strongly recommends utilizing a climate adjustment component to normalize the significant geographic and climatological differences that exist within California. This could be accomplished by assigning a reasonable climate factor based on a climate zone depending upon the location of each water supplier, using readily available evapotranspiration data and maps (see Attachment 2)

The current methodology also does not consider or adjust for low density development. Approximately one quarter of our District lies within the city limits for the City of Redding and are typical of urban development. The remaining two-thirds of our District is rural or agricultural in character. Parcels within this portion of the district are in the two acre to 160 acre size range. A large number of these parcels include agricultural development to some degree; however, other than those parcels that meet the U.S. Bureau of Reclamation requirements for agricultural irrigation water are included in the residential water use category. It does not seem reasonable that these large rural parcels with varying degrees of agricultural development be included in the District's R-GPCD calculations in the same manner that small city parcels are, especially when if one were to consider water consumption on a per acre basis they use less water than a similar area of urban housing. Some consideration for the density of development needs to be included in the State's water conservation tiers.

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The Water Board correctly states on its website "It is not appropriate to use Residential Gallons Per Capita Day (R-GPCD) water use data for comparisons across water suppliers, unless all relevant factors are accounted for" (emphasis added), and then provides an example list of such factors in "An Important Note" (see Attachment 1), and I certainly concur!

The District is a member of the Association of California Water Agencies (ACWA) and is very supportive of their previous regulatory framework comment letter, dated April 13, 2015. Although I have not yet seen their proposed alternative methodology, we support their general position that final regulations should recognize climate and land use.

Thank you for your consideration of these comments.

Sincerely,

Danie J. Loxey

David Coxey, General Manager

#### Attachment 1

#### Monthly Urban Water Supplier Report Data

## **IMPORTANT NOTE!**

It is not appropriate to use Residential Gallons Per Capita Day (R-GPCD) water use data for comparisons across water suppliers, unless all relevant factors are accounted for. Factors that can affect per capita water include:

- **Rainfall, temperature and evaporation rates** Precipitation and temperature varies widely across the state. Areas with high temperature and low rainfall need to use more water to maintain outdoor landscaping. Even within the same hydrologic region or the same water supply district these factors can vary considerably, having a significant effect on the amount of water needed to maintain landscapes.
- **Population growth** As communities grow, new residential dwellings are constructed with more efficient plumbing fixtures, which causes interior water use to decline per person as compared to water use in older communities. Population growth also increases overall demand.
- **Population density** highly urbanized areas with high population densities use less water per person than do more rural or suburban areas since high density dwellings tend to have shared outdoor spaces and there is less landscaped area per person that needs to be irrigated.
- Socio-economic measures such as lot size and income Areas with higher incomes generally use more water than areas with low incomes. Larger landscaped residential lots that require more water are often associated with more affluent communities. Additionally, higher income households may be less sensitive to the cost of water, since it represents a smaller portion of household income.
- **Water prices** Water prices can influence demand by providing a monetary incentive for customers to conserve water. Rate structures have been established in many districts to incentivize water conservation, but the effectiveness of these rate structures to deter excessive use and customers sensitivity to water prices vary.

Source:

http://www.waterboards.ca.gov/waterrights/water\_issues/programs/drought/conservation\_reporting\_info.shtml

### Attachment 2



From: http://www.calpoly.edu/~sede/casestudyCA.html



From: <u>http://poet.lbl.gov/cal-arch/glossary.html</u>