

From: [Sandy Fox](#)
To: [DWR Water Use Efficiency](#)
Cc: [Chris Garner](#); [Lana J. Haddad](#); [Dean Wang](#)
Subject: Comments on the EO B-37-17 Target Framework Workshop (Sept. 8, 2016)
Date: Thursday, September 15, 2016 11:22:38 AM
Attachments: [09152016 LBWD Comments on EO B-37-16 Target Framework.pdf](#)

Please find attached a letter from the Long Beach Water Department regarding our comments on the EO B-37-16 Target Framework Workshop (Sept. 8, 2016).

Sandy Fox
**Secretary to the Board of Water Commissioners &
General Manager
(562) 570-2302**



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Christopher J. Garner
General Manager

September 15, 2016

Submitted via Email to: WUE@water.ca.gov

Subject: Comments on the EO B-37-16 Target Framework Workshop (Sept 8, 2016)

The Long Beach Water Department appreciates the opportunity to comment on the implementation of Governor Brown's Executive Order B-37-16, which calls on the State Agencies to transition to permanent, long-term water conservation measures.

Incorporated in 1888, Long Beach is a thriving, full-service, charter city on the coast in Los Angeles County. Long Beach is the seventh most populous city in California, with nearly half a million residents within 50 square miles; it is also the third most densely populated city of its size. LBWD, in partnership with our community, has long been a statewide leader in water use efficiency and conservation and is supportive of the Governor's goal.

We respectfully submit the following four comments on the target framework workshop:

1. Proposed Framework

First, LBWD fundamentally supports the proposed framework and thanks the State Agencies' for the continued recognition of the diversity of water agencies. The flexibility in this four budget approach accommodates for the diversity of water agencies and their systems, portfolios, built environments, climates and population density, among other factors.

LBWD recognizes that the proposed framework is meant to serve as the basis for a permanent, long-term framework for water use efficiency. During times of extreme shortage, when more stringent conservation measures would be warranted, LBWD suggests that the State should recognize that the four budgets do not have an equal impact on possible reductions in water usage. This distinction between long term efficiency standards and emergency/critical response is important as the necessity, economic impacts, and water savings possible in each respective standard varies greatly. For Long Beach, for example, during emergencies, public health and safety (i.e. indoor) use and CII would rightly take higher priority over outdoor landscape irrigation. In our city, landscape irrigation comprises the largest portion of water use and therefore offers the greatest opportunity for water savings; this may not be the case across the board.

As such, we respectfully suggest that during critical shortages, the indoor and CII budgets be maintained at regular levels to protect public health and safety and economic health of the community; local agencies should be provided the flexibility to determine which budget(s) be cut depending on their particular circumstances, while still meeting their required reductions.



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2. Evapotranspiration Adjustment Factor

LBWD also supports the logic behind developing flexible evapotranspiration adjustment factors according to landscape age. We do agree with comments made during the Sept. 8 Urban Advisory Group workshop that many agencies, including Long Beach Water, do not have the staffing or funding resources necessary to identify the development year of each landscape, parcel by parcel.

3. Remote Sensing Measurement Pilot

The ability to accurately calculate landscape areas in a densely urbanized area like Long Beach must be carefully verified during the remote sensing measurement pilot. In an established built environment with a mature tree canopy, like Long Beach, aerial imagery may not accurately reveal thin landscape strips between multi-story buildings or landscaped areas under awnings or tree cover within compact multifamily courtyards.

4. Outdoor Irrigation Budgets

We would also propose that the outdoor irrigation budget include all irrigable areas, not just irrigated areas. Residents in Long Beach, and across the state, understand that recurring droughts could become the new normal, and they have responsibly responded by cutting back drastically on landscape irrigation and replacing turf lawns with climate appropriate gardens. Given the current state of emergency, some residents have simply let their lawns die.

Only including currently irrigated areas in the outdoor landscape budget excludes irrigable landscapes that may begin watering to establish drought tolerant plants after a turf removal or landscapes that may resume irrigating after the drought emergency. Not appropriately accounting for all irrigable areas in the outdoor watering budget could have negative effects on community quality of life, property values and economic vitality.

For additional clarification or if there are additional questions we can answer, please feel free to contact me directly at chris.garner@lbwater.org or 562-570-2318.

LBWD looks forward to continuing a productive dialogue with the State Agencies. Thank you for your consideration of these comments.

Respectfully,

Christopher J. Garner
General Manager

CJG/ljh