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Attached are the City of Lompoc's comments concerning the Governor's Executive Order B-37-16 and the draft plan for implementation of this order. Thank you for your consideration of these comments.

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October 13, 2016

The following are comments from the City of Lompoc (Lompoc) concerning the October 3, 2016 webinar discussion of the Executive Order B-37-16:

1. Support is given for other water agencies' comments that an annual assessment of the five year Water Shortage Contingency Plan (WSCP) is not necessary, because it is time consuming for water agencies with limited staff and resources. Lompoc also supports keeping the WSCP requirements in the UWMPs.
2. Support is given for comments from other water agencies that the WSCP should be based on shortages, not surpluses. Shortages will be determined with an assessment of supply and demand.
3. Clarification needs to be given concerning standard requirements for the Stages and Triggers in the WSCP. Our understanding is that water agencies will be able to determine their own baseline requirements for reduction and the number of stages that are needed for their water agency. Discussion occurred concerning a budget for the WSCP for communication to customers, financial elements, and customer incentives/disincentives. More information needs to be given about the required budget.

Additional comments concerning Executive Order B-37-16:

1. Our City has a concern about the indoor residential per capita water use and outdoor irrigation requirements, which use local climate and satellite imagery data. Lompoc's 2015 citywide water usage was 91 gpcd and the residential portion of this usage was 58 gpcd. Lompoc has had a well diversified water conservation program since 1989. We would like to suggest that if a water agency maintains an agency per capita water usage of 100 or less for two (2) or more consecutive years that the agency only be required to report overall per capita water usage and residential per capita water usage. The rationale is that any agency with 100 gpcd overall water usage will meet or exceed any State indoor and outdoor water use standards. Also if landscape standards were based on acreage for all customers this would be very time consuming for a small water agency, such as the City of Lompoc. This information is not currently available.
2. Water Loss is mentioned in Executive Order B-37-6. Our suggestion is that the State request water agencies to complete the annual AWWA water loss form when they complete their annual Public Water System Statistics report.