



- Board of Directors
Water Planning and Stewardship Committee

12/9/2014 Board Meeting

8-2

Subject

Approve adjustments to Metropolitan's Water Supply Allocation Plan

Executive Summary

Staff is recommending several adjustments to Metropolitan's Water Supply Allocation Plan to address the current unprecedented drought conditions and water needs within the Metropolitan service area. The recommended adjustments were developed with the input of the member agency managers and staff through a member agency working group process that began in July 2014. The recommended adjustments include: (1) Updating the Base Period from Calendar Years 2004 - 2006 to Fiscal Years Ending 2013 and 2014; (2) updating the Conservation Demand Hardening credit to a method based on member agency per capita water use reductions with considerations for the early enforcement of mandatory conservation ordinances and requirements; (3) including a separate allocation for drought-impacted groundwater basins; and (4) replacing the current penalty rates with an Allocation Surcharge based on marginal water conservation program costs.

Details

Background

The state of California and Metropolitan have been managing through severe drought conditions, and 2014 has been called "unprecedented" in terms of drought and water supply¹. Although Metropolitan has been able to successfully manage its operations during the California drought thus far, 2014 has required significant use of regional storage reserves. It is expected that the end of year total dry year storage reserves will approach levels similar to those in 2009 when mandatory supply allocations were imposed by Metropolitan. While storage levels remain relatively strong, as in 2009, prudent management of remaining storage if severe drought conditions continue into 2015 will likely result in Metropolitan imposing mandatory supply allocations.

In February 2008, the Board approved Metropolitan's Water Supply Allocation Plan (WSAP). The approved WSAP serves as the current policy for allocating water supplies to the member agencies in times of declared water shortages with the goal of reducing the quantity of water used within Metropolitan's service area to conserve supply. The WSAP includes specific formulas for calculating Metropolitan supply allocations to each member agency and also includes implementation elements needed for administering a water supply allocation. The WSAP was developed through an extensive working group process with the management and staff of the member agencies and with the Board. The resulting WSAP allocates supplies based on the needs of agencies throughout the service area and the proposed adjustments in this letter are consistent with that approach. The original development process covered an eight month period starting in July 2007. The WSAP was also formally reviewed on two separate occasions since its adoption. The review processes each resulted in board-adopted adjustments to the plan.

¹ The Governor of California proclaimed a State of Emergency due to drought conditions on January 17, 2014 and, on April 24, 2014 issued an Executive Order proclaiming a continued State of Emergency noting drought conditions have persisted for the last three years and authorizing adoption and implementation of emergency regulations.

The WSAP was implemented in the last drought. The WSAP was implemented at a Regional Shortage Level 2 from July 1, 2009 through June 30, 2010 and again from July 1, 2010 through June 30, 2011. The Board rescinded the allocation in April 2011 due to vastly improved water supply conditions.

Process

Following discussion at the June 2014 Water Planning and Stewardship Committee, Metropolitan staff convened a member agency working group to revisit the WSAP plan. The purpose of the working group was to collaborate with the member agencies to identify potential revisions to the WSAP in preparation for mandatory supply allocations in 2015. There have been eight working group meetings and three discussions at the monthly Member Agency Managers' Meeting. **Attachment 1** shows a listing of the meetings that were held as part of the WSAP working group process.

The process focused on three areas of the WSAP: the Base Period, the Allocation Formula, and the Allocation enforcement mechanism. To prepare the working group for discussion in each of the areas, Metropolitan staff conducted an in-depth review of the current WSAP and its supporting policies. The working group then discussed and reviewed potential revisions in each of the areas, developing or eliminating items from discussion. In some cases, items were deferred and are intended to be addressed at a later time. Based on the process and discussion from the working group, staff recommends the following adjustments to the WSAP.

Recommended Adjustments to the Water Supply Allocation Plan

Staff recommends that the Board consider four adjustments to the WSAP:

1. Update the WSAP Base Period to Fiscal Years Ending 2013 and 2014. This would include a process to account for agencies that had mandatory water use restrictions in place during the updated Base Period;
2. Update the method for calculating Conservation Demand Hardening Credits;
3. Add a separate allocation for drought-impacted groundwater basins; and
4. Replace the WSAP Penalty Rates with an Allocation Surcharge based on the marginal costs of conservation programs.

If approved, these adjustments would replace related elements of the current WSAP. The recommended adjustments are detailed below.

1. Update the WSAP Base Period to Fiscal Years Ending 2013 and 2014 - The WSAP "Base Period" is used to determine the retail consumptive water demands for each member agency. The "Base Period" retail demand is adjusted for growth in population, conservation savings, and non-potable recycling production occurring from the base period to the Allocation Year. The current method uses the average of retail consumptive water demand in Calendar Years 2004-2006. Keeping the current WSAP Base Period for a 2015 Allocation Year would require 10 years of estimated growth adjustments.

The proposed update to the WSAP Base period replaces Calendar Years 2004-2006 with Fiscal Years 2013 and 2014. These more recent years provide a more up to-date-estimate of current retail consumptive water demand. For a 2015 Allocation Year, only one year of estimated growth adjustments would be required, thus minimizing any estimation error involved in adjusting retail water use. **Attachment 2** includes the data used to calculate retail consumptive water demands for each member agency and estimated Allocation Year amounts.

There are member and retail agencies within Metropolitan's service area that were in mandatory water use restrictions and/or rationing during the updated Base Period. For those agencies, using the updated Base Period could reflect lower retail water use due to mandatory restrictions that were already in place. Without adjusting for this, those agencies could be required to enforce even higher levels of restrictions under an allocation than those agencies that have not started mandatory restrictions. Staff recommends a consultation process that would allow member agencies to describe mandatory restrictions that were in place during the updated Base Period. Restrictions vary among agencies, but include restricted water uses, fines, and water budget or penalty based rate structures that are enacted by the governing body of the member agency or retail agency. Following the consultation process, staff would recommend

adjustments for an agency based on evidence of reduced Gallons Per Capita Per Day (GPCD). To qualify for an adjustment, reductions would have to be observed that are beyond those expected from the agency's ongoing conservation efforts and trends. Any adjustments determined to be appropriate would be reported to the Board in conjunction with future staff recommendations for implementing the WSAP.

2. Update the methodology for calculating Conservation Demand Hardening Credits – Conservation Demand Hardening occurs at the retail water use level as consumers implement more conservation savings devices and programs. In short, member agencies whose customers have implemented conservation savings devices and programs have “harder” demands than those that have not. The current WSAP formula includes a method for estimating total conservation savings and providing additional supply allocation to account for demand hardening due to the conservation savings.

The current WSAP method uses an extensive model calculation that includes installed conservation devices, water savings rates, demographic growth, plumbing codes/ordinances, and estimates of conservation due to price and water rate structures to determine conservation savings. The updated methodology would replace the current calculation-intensive method with one based on observed reductions in GPCD.

In order to estimate conservation savings, each member agency will establish a historical baseline GPCD calculated in a manner consistent with California Senate Bill SBx7-7. Reductions from the baseline GPCD to the Allocation Year would be the basis used to calculate the equivalent conservation savings in acre-feet. The Conservation Demand hardening credit will be based on an initial 10 percent of the GPCD-based Conservation savings plus an additional 5 percent for each level of Regional Shortage set by the Board during implementation of the WSAP. The credit will also be adjusted for:

- a. The overall percentage reduction in retail water demand
- b. The member agency's dependence on MWD

This provides a base demand hardening credit equal to 10 percent of conservation savings and increases the credit as deeper shortages occur, which is when conservation demand hardening has a bigger impact on the retail consumer. The credit also increases based on the percentage of an agency's demand that was reduced through conservation. This accounts for increased hardening that occurs as increasing amounts of conservation are implemented. Lastly, the credit is scaled to the member agency's dependence on Metropolitan to ensure that credits are being applied to the proportion of water demand that is being affected by reductions in Metropolitan supply.

3. Add a separate allocation for drought-impacted groundwater basins - The current WSAP does not provide an allocation specifically to assist drought impacted groundwater basins. Groundwater basins help provide vital local supplies that can buffer the region from short-term drought impacts. Longer droughts can result in reductions to the many sources of water that replenish groundwater basins, resulting in lower basin levels and potential impacts to the overlying consumptive demands. Limited imported deliveries under these conditions may help avoid impacts to the basins that may be drawn out of their normal operating range or subject to water quality or regulatory impacts. Staff recommends a limited allocation for drought impacted groundwater basins based on the following framework:
 - a. Staff would hold a consultation with a requesting member agency and the appropriate groundwater basin manager to document whether the basin is in one of the following conditions:
 - i. Groundwater basin overdraft conditions that will result in water levels being outside normal operating ranges during the WSAP allocation period; or
 - ii. Violations of groundwater basin water quality and/or regulatory parameters that would occur without imported deliveries.
 - b. Provide an allocation based on the verified need for groundwater replenishment. The allocation would start with a member agency's ten-year average purchases of imported groundwater replenishment supplies (excluding years in which deliveries were curtailed). The amount would

then be reduced by the declared WSAP Regional Shortage Level (5 percent for each Regional Shortage Level).

- c. Any allocation provided under this provision for drought impacted groundwater basins is intended to help support and maintain groundwater production for consumptive use. As such, a member agency receiving an allocation under this provision will be expected to maintain groundwater production levels equivalent to the average pumping in the Base Period. Any adjustments to a member agency's M&I allocation due to lower groundwater production would be reduced by deliveries made under this provision.
- d. Agencies for which this allocation does not provide sufficient supplies for the needs of the groundwater basin may use the WSAP Appeals Process to request additional supply (subject to Board approval). The appeal should include a Groundwater Management Plan that documents the need for additional supplies according to the following tenets:
 - i. Maintenance of groundwater production levels;
 - ii. Maintenance of, or reducing the further decline of, groundwater levels;
 - iii. Maintenance of key water quality factors/indicators;
 - iv. Avoidance of permanent impacts to groundwater infrastructure or geologic features; and
 - v. Consideration of severe and/or inequitable financial impacts.

While final amounts and allocations will be determined following consultation with groundwater basin managers and member agencies, **Attachment 3** shows the ten-year average of historical replenishment purchases for member agencies that have been active in purchasing replenishment water since 2010. **Attachment 3** also shows estimated allocations of Groundwater Replenishment under the different Regional Shortage Levels.

4. Replace the WSAP Penalty Rates with an Allocation Surcharge based on the marginal costs of conservation programs - The current WSAP uses a Penalty Rate to disincentivize member agencies from exceeding their supply allocations. The Penalty Rate is based on a multiple of Metropolitan's fully encumbered Tier 2 Untreated Rate for water. Water use between 100 percent to 115 percent of supply allocations is charged a Penalty Rate of two times the fully encumbered Tier 2 Untreated Rate, and use greater than 115 percent of supply allocations is charged a Penalty Rate of four times the fully encumbered Tier 2 Untreated Rate. The Penalty Rate is charged over and above the water rates for the use of the water.

Staff recommends replacing the WSAP Penalty Rates with an Allocation Surcharge. The proposed Allocation Surcharge is based on the costs that Metropolitan and its member agencies are incurring to implement outdoor water use reductions through turf removal programs. The Allocation Surcharge would provide a price signal based on the marginal conservation costs incurred to reduce water use in dry and shortage years. Any revenues collected from the Allocation Surcharge would be used to fund the implementation of the Turf Removal program or other similar programs designed to conserve water and reduce future demands.

The Allocation Surcharge is based on Metropolitan's current cost of the turf removal program. Metropolitan is currently paying \$2 per square foot of turf removed. The estimated water savings is 44 gallons per year for each square foot of turf removed for a period of ten years. Based on this savings rate, the estimated cost of the program is \$1,480 per acre-foot.

Water use between 100 percent and 115 percent of WSAP supply allocations would be charged with the Allocation Surcharge of \$1,480 per acre-foot. Water use greater than 115 percent of WSAP supply allocations would be charged two times the Allocation Surcharge or \$2,960 per acre-foot. Two times the Allocation Surcharge would allow the funding of additional turf removal and conservation programs to

conserve additional water and further reduce demand or, if appropriate, allow for a higher per square foot incentive payment.

Recommendation

Following the input from the member agencies during the WSAP working group process, staff recommends that the Board approve the four described adjustments to the WSAP. If approved, staff will incorporate the adjustments into the WSAP and prepare the plan for use in any upcoming implementations of the WSAP. Staff will also make available an updated version of the Water Supply Allocation Plan Handbook that incorporates the approved adjustments.

In the interest of completing WSAP revision discussions for board consideration in December, both Metropolitan and member agency staff recognize that not all outstanding issues can be resolved during this timeframe. Two issues have been identified that remain for future policy development and are not addressed in the current proposed revisions to the WSAP. One issue is to investigate how Metropolitan provides incentives through its varied programs, including the WSAP, to ensure development of locally produced supplies consistent with Metropolitan's Integrated Resource Plan objectives. The second issue is a desire to develop a policy framework for groundwater replenishment deliveries that recognizes the long-term consumptive demand on MWD, and establishes service provisions consistent with both the variable nature of replenishment demands and payment of Metropolitan's full service rate.

Policy

By Minute Item 47393, dated February 12, 2008, the Board adopted the Water Supply Allocation Plan.

By Minute Item 48376, dated August 17, 2010, the Board adopted proposed adjustments to the Water Supply Allocation Plan, and approved the allocation of seawater barrier supplies for 2010/11.

By Minute Item 48803, dated September 13, 2011, the Board adopted proposed adjustments to the Water Supply Allocation Plan.

California Environmental Quality Act (CEQA)

CEQA determination for Option #1

The Water Supply Allocation Plan previously was determined to be categorically and statutorily exempt under the provisions of CEQA and State CEQA Guidelines. Specifically, the WSAP was found to be exempt under 15301 (Class 1), 15307 (Class 7), 15308 (Class 8) and 15378(b)(4) of the State CEQA Guidelines. In addition, the WSAP was found to be exempt pursuant to Water Code Section 10652, to the extent this plan serves as the basis for the urban water shortage contingency analysis required under Water Code Section 10631 and is incorporated into Metropolitan's RUWMP. These determinations were made on February 12, 2008, and a Notice of Exemption (NOE) was filed shortly thereafter. With the current board action, there is no substantial change proposed to the project. Hence, the previous environmental documentation prepared in conjunction with the project fully complies with CEQA and the State CEQA Guidelines. In addition, the proposed action is not defined as a project under CEQA because it involves continuing administrative actions, such as general policy and procedure making (Section 15378(b)(2) of the State CEQA Guidelines), and other government fiscal activities which do not involve any commitment to any specific project which may result in a potentially significant physical impact on the environment (Section 15378(b)(4) of the State CEQA Guidelines). Accordingly, no further CEQA documentation is necessary for the Board to act with regard to the proposed action.

The CEQA determination is: Determine that the WSAP has been addressed previously in the original NOE, the proposed action is not defined as a project subject to CEQA, and that no further environmental analysis or documentation is required.

CEQA determination for Option #2:

None required

Board Options

Option #1

Adopt the CEQA determination that the item is categorically and statutorily exempt and approve adjustments to the Water Supply Allocation Plan.

Fiscal Impact: None

Business Analysis: Recommended adjustments improve the existing WSAP and also address groundwater basin needs during shortage conditions.

Option #2

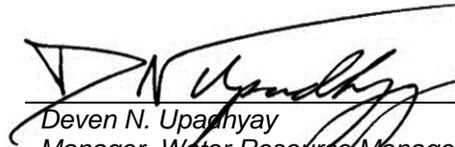
Do not approve adjustments to the Water Supply Allocation Plan and keep the current Water Supply Allocation Plan as Metropolitan’s policy and method for allocating water to the member agencies.

Fiscal Impact: None

Business Analysis: Current Water Supply Allocation Plan has some deficiencies that will be kept in place without the approval of adjustments. Groundwater replenishment needs and deliveries will not be addressed under the current Water Supply Allocation Plan.

Staff Recommendation

Option #1

	11/26/2014
Deven N. Upadhyay Manager, Water Resource Management	<i>Date</i>

	11/26/2014
Jeffrey Kightlinger General Manager	<i>Date</i>

Attachment 1 – 2014 WSAP Review Process Meeting Summary

Attachment 2 – 2014 WSAP Member Agency Base Period and Allocation Year Data

Attachment 3 – 2014 WSAP Member Agency Maximum Potential Seawater Barrier and Replenishment Allocations

2014 WSAP Review Process Meeting Summary

Meetings with Member Agencies to Discuss and Consider Improvements to the Water Supply Allocation Plan

Date	Meeting	Description
July 14, 2014	WSAP Workgroup Meeting #1	First meeting of the 2014 WSAP Review process; review of the existing WSAP policy and formula; review of the process timeline; began discussion of issues related to base period selection
July 25, 2014	WSAP Workgroup Meeting #2	Discussion of base period selection
August 27, 2014	WSAP Workgroup Meeting #3	Continuation of prior workshop discussion; comparison of base period alternatives
September 10, 2014	WSAP Workgroup Meeting #4	Discussion of a base period proposal; discussion of replenishment issues in the WSAP; discussion of 2015 water supply scenarios.
September 12, 2014	Member Agency Managers Meeting	Review of WSAP workgroup process; discussion on issues related to base period, demand hardening, and local resources development
September 29, 2014	WSAP Workgroup Meeting #5	Review of base period recommendation; discussion of issues regarding agencies in mandatory conservation during a base period; discussion on replenishment in the WSAP
October 9, 2014	WSAP Workgroup Meeting #6	Continuation of prior workshop discussion; discussion of alternative methods for conservation demand hardening credit; discussion of new and existing local supplies
October 17, 2014	Member Agency Managers Meeting	Review of WSAP workgroup process; discussion of issues related to base period and demand hardening
November 3, 2014	WSAP Workgroup Meeting #7	Review and discussion of issues and potential methods for base period selection and adjustment, replenishment allocation, and conservation demand hardening credit; review of estimated effects of potential WSAP changes at the regional level
November 14, 2014	WSAP Workgroup Meeting #8	Review of proposed recommendations for the WSAP based on workgroup discussion
November 21, 2014	Member Agency Managers Meeting	Review of proposed recommendations for the WSAP based on workgroup discussion

2014 WSAP Member Agency Base Period and Allocation Year Data

Member Agency	Local Supplies		MWD Purchases		Retail Demand		Allocation Year 2015		
	FY2012-13	FY2013-14	FY2012-13	FY2013-14	FY2012-13	FY2013-14	Retail Demand	Local Supply	WSAP Baseline
Anaheim	44,980	51,402	21,105	13,635	66,084	65,037	66,006	51,402	14,604
Beverly Hills	733	747	11,114	11,632	11,847	12,379	12,149	747	11,402
Burbank	11,754	10,976	7,628	8,817	19,382	19,793	19,885	10,976	8,908
Calleguas	37,490	42,451	109,933	116,685	147,423	159,136	153,911	42,451	111,460
Central Basin	185,830	183,330	37,501	33,951	223,331	217,280	215,719	183,330	32,390
Compton	6,347	7,858	1,683	44	8,030	7,902	8,012	7,858	154
Eastern	100,071	102,370	96,913	104,627	197,855	206,997	209,275	102,370	106,905
Foothill	9,519	8,845	8,112	10,018	17,631	18,863	18,304	8,845	9,459
Fullerton	19,489	21,279	9,205	8,776	28,694	30,055	29,567	21,279	8,288
Glendale	8,666	7,598	18,764	20,341	27,429	27,939	28,609	7,598	21,011
Inland Empire	192,972	199,330	59,051	67,038	252,023	266,367	267,791	199,330	68,461
Las Virgenes	141	144	22,741	22,360	22,882	22,504	22,951	144	22,807
Long Beach	32,399	29,085	27,376	30,540	59,775	59,625	60,060	29,085	30,975
Los Angeles	176,567	139,643	388,907	447,113	565,474	586,756	620,179	139,643	480,536
MWDOC	231,655	252,486	190,804	191,515	422,459	444,001	435,069	252,486	182,582
Pasadena	14,648	10,883	18,254	23,097	32,902	33,979	33,578	10,883	22,695
SDCWA	252,484	239,961	462,849	536,712	544,437	596,416	574,215	239,961	334,254
San Fernando	3,100	3,108	118	61	3,218	3,170	3,209	3,108	101
San Marino	4,552	4,418	814	1,583	5,367	6,001	5,695	4,418	1,277
Santa Ana	26,730	27,914	12,454	10,343	39,184	38,257	39,056	27,914	11,143
Santa Monica	7,231	8,551	6,331	5,900	13,562	14,452	14,005	8,551	5,454
Three Valleys	53,448	52,007	58,484	67,962	111,932	119,968	117,051	52,007	65,044
Torrance	4,691	4,623	16,855	17,210	21,546	21,833	21,278	4,623	16,655
Upper San Gabriel	161,506	164,038	3,529	3,490	165,035	167,528	166,695	164,038	2,657
West Basin	32,662	34,283	117,288	117,455	149,950	151,738	151,677	34,283	117,395
Western	186,497	183,858	68,457	75,910	260,997	259,768	261,793	183,858	77,934
TOTAL	1,806,162	1,791,189	1,776,268	1,946,813	3,418,448	3,557,746	3,555,737	1,791,189	1,764,548

2014 WSAP Member Agency Maximum Potential Seawater Barrier and Replenishment Allocations

Member Agency	Maximum Seawater Barrier Allocation	Maximum Replenishment Allocation											Total Maximum Seawater Barrier and Replenishment Allocations										
		Baseline	Level 1	Level 2	Level 3	Level 4	Level 5	Level 6	Level 7	Level 8	Level 9	Level 10	Baseline	Level 1	Level 2	Level 3	Level 4	Level 5	Level 6	Level 7	Level 8	Level 9	Level 10
Anaheim	-	3,000	2,850	2,700	2,550	2,400	2,250	2,100	1,950	1,800	1,650	1,500	3,000	2,850	2,700	2,550	2,400	2,250	2,100	1,950	1,800	1,650	1,500
Beverly Hills	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Burbank	-	2,800	2,660	2,520	2,380	2,240	2,100	1,960	1,820	1,680	1,540	1,400	2,800	2,660	2,520	2,380	2,240	2,100	1,960	1,820	1,680	1,540	1,400
Calleguas	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Central Basin	-	23,100	21,945	20,790	19,635	18,480	17,325	16,170	15,015	13,860	12,705	11,550	23,100	21,945	20,790	19,635	18,480	17,325	16,170	15,015	13,860	12,705	11,550
Compton	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Eastern	-	7,000	6,650	6,300	5,950	5,600	5,250	4,900	4,550	4,200	3,850	3,500	7,000	6,650	6,300	5,950	5,600	5,250	4,900	4,550	4,200	3,850	3,500
Foothill	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fullerton	-	2,700	2,565	2,430	2,295	2,160	2,025	1,890	1,755	1,620	1,485	1,350	2,700	2,565	2,430	2,295	2,160	2,025	1,890	1,755	1,620	1,485	1,350
Glendale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Inland Empire	-	17,100	16,245	15,390	14,535	13,680	12,825	11,970	11,115	10,260	9,405	8,550	17,100	16,245	15,390	14,535	13,680	12,825	11,970	11,115	10,260	9,405	8,550
Las Virgenes	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Long Beach	4,000	5,100	4,845	4,590	4,335	4,080	3,825	3,570	3,315	3,060	2,805	2,550	9,100	8,845	8,590	8,335	8,080	7,825	7,570	7,315	7,060	6,805	6,550
Los Angeles	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
MWDOC	-	51,100	48,545	45,990	43,435	40,880	38,325	35,770	33,215	30,660	28,105	25,550	51,100	48,545	45,990	43,435	40,880	38,325	35,770	33,215	30,660	28,105	25,550
Pasadena	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SDCWA	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
San Fernando	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
San Marino	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Santa Ana	-	3,500	3,325	3,150	2,975	2,800	2,625	2,450	2,275	2,100	1,925	1,750	3,500	3,325	3,150	2,975	2,800	2,625	2,450	2,275	2,100	1,925	1,750
Santa Monica	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Three Valleys	-	5,100	4,845	4,590	4,335	4,080	3,825	3,570	3,315	3,060	2,805	2,550	5,100	4,845	4,590	4,335	4,080	3,825	3,570	3,315	3,060	2,805	2,550
Torrance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Upper San Gabriel	-	29,500	28,025	26,550	25,075	23,600	22,125	20,650	19,175	17,700	16,225	14,750	29,500	28,025	26,550	25,075	23,600	22,125	20,650	19,175	17,700	16,225	14,750
West Basin	11,200	-	-	-	-	-	-	-	-	-	-	-	11,200	11,200	11,200	11,200	11,200	11,200	11,200	11,200	11,200	11,200	11,200
Western	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
TOTAL	15,200	150,000	142,500	135,000	127,500	120,000	112,500	105,000	97,500	90,000	82,500	75,000	165,200	157,700	150,200	142,700	135,200	127,700	120,200	112,700	105,200	97,700	90,200