



April 13, 2015

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: ***Comment Letter – Recommendations on the Proposed Regulator Framework to Achieve a Statewide 25% Reduction in Potable Urban Water Usage***

Dear Chair Marcus and State Water Resources Control Board members:

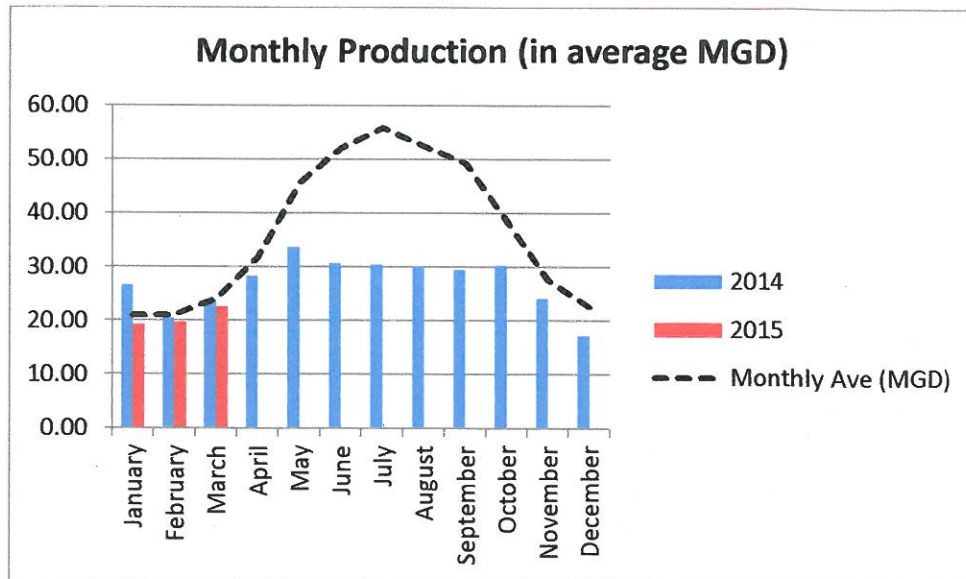
Zone 7 Water Agency appreciates the opportunity to provide recommendations that the State Water Board could consider to respond to Governor Brown's Executive Order Executive Order calling for a statewide 25% reduction in potable urban water usage. Our recommendations build on those presented by the California Urban Water Agencies (CUWA) and the discussions held during CUWA's meeting with Chair Marcus, Vice Chair Spivy-Weber and State Water Board staff in early April.

As with groundwater management in the state, Zone 7 would strongly urge any permanent conservation programs to be developed by local implementing agencies to meet statewide policies and targets (such as the 20 X 2020 objectives) but that details of such programs should be determined and managed locally based on local water supply conditions, local weather (average evapotranspiration rates), salt and nutrient management planning (for instance, Zone 7 encouraged initial recycled water use over its fringe basins rather than its Main Basin while a demineralization facility was under construction; this means that one retail water agency lowered per capita usage more quickly than the others served by Zone 7; the latter should not be penalized for following a salt management strategy) and other factors of local significance.

However, recognizing the need to immediately develop implementation regulations this year for Governor Brown's Executive Order, Zone 7 applauds the State Board's thoughtful, transparent approach. Zone 7 suggests a few points of possible improvement in the draft framework. First of all, if a water supplier adopts criteria equal to or more stringent than the state requirements, that should not only satisfy the state mandates but be supported under the Executive Order; any final language should not imply that the target percent reductions are all that a local agency needs to do. Second, credit should be given for accomplishments last year since it was part of the same drought. Perhaps tiers should be established based not on per capita use but instead on conservation achieved last year. For instance, if the target is 25% savings and a retail agency achieved 29% savings in 2014, then it should only have to achieve 21% in 2015 so that the overall savings would be 25%.

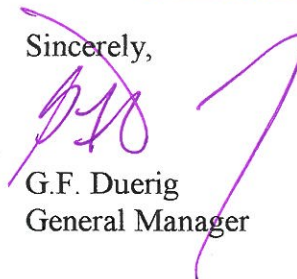
Another point is that this region's successful conservation during 2014 relied almost exclusively on reduction of outdoor watering. The following graph shows that reductions were much greater than 25% during the summer irrigation season but nearly zero during "shoulder" months when

very little irrigation occurs. Therefore, if any fine/penalty structure is to be considered, it should be based on achieving cumulative reductions by year end or else meeting targets prepared by the individual agencies to achieve such cumulative reductions rather than daily or even monthly reductions.



Thank you for considering these suggestions. If you have any questions or wish to discuss further, please do not hesitate to contact me at 925 454-5000 (jduerig@zone7water.com).

Sincerely,



G.F. Duerig
General Manager