



## CITY OF BRISBANE

50 Park Place  
Brisbane, California 94005-1310  
(415) 508-2100  
Fax (415) 467-4989

(7/15-16/14) Board Meeting- Item 10  
Urban Water Drought Emergency Regulations  
Deadline: 7/14/14 by 12:00 noon



July 14, 2014

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100, Sacramento, CA 95812-2000  
*Original/only copy delivered via email to [comentletters@waterboards.ca.gov](mailto:comentletters@waterboards.ca.gov)*

Subject: Comment Letter – July 15, 2014 Board Meeting-Item 10:  
Emergency Water Conservation Regulations

Dear Board Members,

This letter offers comments on the Proposed Text of Emergency Regulations. Our comments on the Notice of Proposed Emergency Rulemaking, Emergency Regulations Digest, and Fact Sheet for Proposed Emergency Water Regulations are provided under separate correspondence.

I am the responsible party for the City of Brisbane (Brisbane) and the Guadalupe Valley Municipal Improvement District (GVMID) community water systems. The following changes to the proposed text are respectfully submitted:

**Proposed Change 1, Section X.2 (b):**

(b) To promote water conservation, each urban water supplier, **and each distributor of a public water system that has the functional equivalent of a water shortage contingency plan**, shall implement all requirements and actions . . .

Rationale for Proposed Change: Brisbane and GVMID are active public water systems that based on the size of population served and volume of water delivered do not meet the Water Code section 10617 definition of urban water supplier. Although we are not required to develop an Urban Water Management Plan and a Water Shortage Contingency Plan (WSCP), we have strong water waste provisions already codified. The latest survey information for these combined systems reveal that our average residential consumption is **50** gallons per capita per day, which is well below the regional urban water use target of 131 gallons established in the 20x2020 Water Conservation Plan for DWR Hydrologic Region 2.

Brisbane and GVMID are presently developing the functional equivalent of a WSCP (e.g., the plan will include “trigger” levels for additional specified conservation measures, but will not

July 14, 2014  
Jeanine Townsend, SWRCB  
Proposed Emergency Regulations Text  
Page 1 of 2  
08-20-00



include certain WSCP required items such as an economic impact analysis of the measures), and strongly believe that the measures we are developing will be much more effective and fair to our customers at implementing additional water conservation than the proposed statewide “one size fits all” measures.

**Proposed Change 2, Section X.2 (e):**

(e) To promote water conservation, each distributor of a public water supply, as defined in Water Code section 350, that is not an urban water supplier, **unless that distributor has the functional equivalent of a water shortage contingency plan**, shall, within thirty (30) days . . .

Rationale for Proposed Change: As noted above, Brisbane and GVMID have commendably low current consumption patterns that more than meet the targets proposed in the 20x2020 Water Conservation Plan. We strongly believe that our continued self-governance in the area of wisely using water, coupled with our pending functional equivalent of a WSCP, will result in continuing consumption patterns that are most appropriate for our community, and that will continue to lead the state in demonstrating wise residential water usage.

Please call me at (415) 508-2131 if there are any questions regarding this matter.

Very truly yours,



Randy L. Breault, P.E.  
Director of Public Works/City Engineer

Cc: Clay Holstine, David Kahn