



Public Utilities

879 Morro Street, San Luis Obispo, CA 93401-2710
805.781.7215
slocity.org

Date: April 13, 2015

To: State Water Resources Control Board

From: Carrie Mattingly, Utilities Director, City of San Luis Obispo
Aaron Floyd, Deputy Director Utilities, City of San Luis Obispo

Re: Proposed 25% Water Reduction Framework

The City of San Luis Obispo is in general support of the framework released on April 7, 2015 to implement the Governor's Executive Order. Understanding the state is in an unprecedented drought, the City would like to offer the following suggestions to improve the framework.

Apportioning Water Suppliers Reductions

The proposed tier structure attempts to achieve proportionate water reduction equity between the spectrums of per capita water use. The observation is that communities that have very low to low per capita water use are being asked to proportionately reduce more than communities that have high to extremely high water use. It is suggested that additional tiers be added (5%, 10%, 15%, etc.) with tighter bands for per capita water use. To address the reduction proportionality issue it is further recommended that the top tier be 50% or more. There are many communities listed that can make a full 50% reduction and still remain at more than twice the consumption rate of several other purveyors. Understanding that an analysis would need to be performed to confirm the 25% statewide reduction could be met, the following table illustrates the proposed concept.

Proposed Reductions

Tier 1	Tier 2	Tier 3	Tier 4	Tier 5	Tier 6	Tier 7
0-55	56-75	76-100	101-125	126-150	151-200	201+
0%	10%	15%	20%	25%	35%	50%

New Reporting Requirements

The CII water reduction requirements are vague in both the Executive Order and framework. It is suggested that more specific requirements be directed to CII landscapes with some flexibility given to communities to decide how to reduce indoor CII water use based on the different water needs of particular business or facility type. CII customers that have landscape and indoor use on one master meter should also be addressed in the framework. Additionally, it is important to understand that water agencies, especially smaller ones, will sometime combine CII into one category like commercial.

Compliance Assessment

It is suggested that there be some flexibility when determining compliance based on a month to month comparisons. Communities with very low water use during the winter months will struggle to meet the reductions goals. Being able to use an annual cumulative percentage will allow flexibility to these communities while achieving the overall water

reduction requirement desired in the Executive Order. While monthly reporting may still be beneficial for comparative purposes and for providing better insight to individual community trends, the ultimate goal should be a reduction of the required percentage across the entire time period of June 2015 through February 2016.