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Transmitted via: commentletters@waterboards.ca.gov

Jeanine Townsend, Clerk to the Board
Tom Howard, Executive Director
State Water Resources Control Board
1001 I Street, 24th Floor [95814]
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Comment Letter to Emergency Regulations Development to Achieve 25% Conservation

Dear Ms. Townsend and Mr. Howard:

The City of Ventura, Ventura Water, has reviewed the Governor's Executive Order B-29-15, and we submit the following comments for your consideration in developing regulations to achieve 25% conservation:

- We are supportive of how the Board apportioned water supply reductions.
- With regard to the new reporting requirements, how will outdoor water use be measured if irrigation meters are not installed for all nonresidential customers?
- Production was originally chosen as the reporting amount because most utilities are on a bi-monthly billing cycle. So how will monthly actually be calculated? If it is not part of the enforcement and measuring success then this is less of a concern to our agency.
- How will Caltrans minimize watering in the freeway green ways? This customer is in our top ten non-residential customers based upon consumption.
- How will recycled water permits be expedited? We are desperately trying to truck this water to minimize potable water use for dust control and irrigating city trees, but delays in permitting continues to be a hurdle for us.

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- Our City's Water Shortage Event Contingency Plans go by tens (10%, 20%, 30%, etc.) instead of fives (5%, 10%, 15%, etc.) as the Governor's Executive Order asks (25% conservation) and at the same time requests us to implement our contingency plans, can the rules that come out from the Board address this conflict? We are sure we are not the only agency with this type of conservation structure.
 - If new development has been approved/entitled but not built, how will they be asked to comply with these new regulations if at all?

Thank you for allowing public comment on the Governor's Executive Order B-29-15. If you have questions or concerns about these comments, please feel free to contact me at (805) 652-4518 or sepstein@venturawater.net.

Sincerely,



Shana Epstein
General Manager