

Jessica,

Thank you for the opportunity to comment on the draft regulatory framework that would implement the governor's executive orders related to the current drought situation.

We are very supportive of statewide conservation efforts. However, we are also very concerned about the suggested mandatory implementation for small water agencies. In the draft it states that *"Under this proposal, small water suppliers would be required to achieve a 25% water savings as compared to their 2013 water use under the new regulation."* This approach is very different from the restrictions for urban water suppliers and not based on the same principles as the tiered approach considering per capita usage.

The Montara Water & Sanitary District (MWSD) is a small water supplier with an extremely low per capita consumption as is. Having to cut back water consumption by 25% would result in HEALTH AND SAFETY issues.

The District received the 2009 Silicon Valley Water Conservation Award for the lowest per capita use in California. An extensive conservation program combined with an involved customer base that is aware of local water issues resulted in further water use reductions of more than 25% District wide. MWSD's customers haven't been using potable water outdoors for a long time. Our customers have been collecting shower water and kitchen sink water for years - Not to irrigate, but to flush toilets. Any further significant use restrictions will impact Health and Safety of residents in our community.

The District relies 100% on local surface water and groundwater sources. Millions of dollars have been spent in the past years to add storage capacity and water sources. An extensive groundwater monitoring and stream gaging program assures sustainability of all sources in the District. In working together with the California Coastal Commission the District agreed to set aside 50% of all available capacity for drought contingencies. In other words, we have been doing our part and prepared for the current situation. MWSD can be an example of water use efficiency and drought planning for entire California.

We are located next to Coastside County Water District (CCWD), who is listed in the regulations as the urban water suppliers with the overall lowest per capita demand in the 40gpd range. So far, every year MWSD's per capita consumption has been lower than CCWD's. It would be very difficult for anyone to understand why one Coastside community would be asked to cut back twice as much as their neighbors, even though they've used less.

Once again, we will be happy to contribute to California wide water use reductions. Please ensure that the new regulations are fair for everyone, including small water providers.

Thanks,

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