

THE CITY OF



April 13, 2015

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> 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:

The City of Pleasanton would like to confirm our support for the Governors Executive Order B-29-15 for California. We appreciate that the State is instituting the conservation measures that at least match what the City of Pleasanton immediately instituted after the Governors declaration of emergency back in January 2014. Of specific interest to Pleasanton is section 19:

“State permitting agencies shall prioritize review and approval of water infrastructure projects and programs that increase local water supplies, including recycling facilities, reservoir improvement projects, surface water treatment plants, desalination plants, Storm water capture, and greywater systems. Agencies shall report to the Governor’s Office on applications that have been pending for longer than 90 days.”

The City of Pleasanton has an excellent large scale “shovel-ready” recycled water irrigation project that has unfortunately been delayed for months by just such an impasse in the permitting process. We are currently working through issues related to section 106 Historical Preservation Act and hope to move forward soon with the excellent help we are receiving from the State Water Resources Staff. This as an excellent opportunity to demonstrate a successful execution of this section of the Governors order and help us begin this very timely project as soon as possible to give us a chance to further reduce potable water consumption before 2015 is over. Our request is not to exempt us from any requirements but to consider the investment and progress by our City for our aggressive conservation in 2014, and continuing in 2015 and for diversifying our water supply with this recycled water project that will produce 1,375 ac/ft of supply when completed.

While R-GPCD is a reasonable starting point for analysis of where agencies in California are currently at, we believe but there is room to take additional factors into consideration beyond the simple September data only model such as our 2014 reductions and the aforementioned recycled water program success.

The Tri-Valley Water retailers were extremely successful in 2014 conservation reaching at least 25% reduction overall as compared to 2013. This included Pleasanton, Livermore, Dublin San Ramon Services District, and California Water Service (Livermore area). This was accomplished by all of these agencies working together with our communities with a consistent message and advertising campaign that

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achieved the desired results. Your designation for 2015 released recently has Dublin San Ramon Services at 20% and the remaining three agencies at 25%. Pleasanton has concerns that this is confusing to the consumer in our community and could be alleviated by the Commission re-evaluating the Tri-Valley's successful numbers for 2014 entirely and considering 2015 results to date as well as the programs the Valley is instituting for 2015. Pleasanton's numbers alone were extremely successful at 27.8% reduction with a volume of 1,648,000,000 gallons saved. Pleasanton feels this approach will allow us to continue to work together and be as successful in 2015 as we were in 2014. We would ask you to consider a more comprehensive approach and offer a couple of suggestions below to consider

**Step 1:** Calculate an R-GPCD average from all of the 2014 reporting data. This has multiple immediate benefits. This eliminates "single sample" error, and normalizes the usage over time giving you a much more accurate representation of what each agencies real R-GPCD is. It reduces the inflation error that exists between agencies with monthly billing that only represents September consumption and agencies with bi-monthly billing that is skewed by including August usage in the September R-GPCD calculation. It also takes into consideration the wet December which tells you who responded aggressively with making potable irrigation cutbacks and who did not. To take it a step further, we would also request expanding the reporting data back to at least the Governors declaration of emergency and call for conservation after January 2014. Every agency already has that all of that data readily on hand for their mandatory EAR report due now and can supply that information to the board within days of request. An alternative to this would be to use a 12 month rolling average from the most recent consumption data as a more representative measure.

**Step 2:** Allow cooperating agencies that can demonstrate a clearly defined region either with their distribution systems or their common wholesale water supplies to pool all of their numbers to create a common conservation goal. The purpose of this is to not create conflicting conservation messages between agencies that are trying to work together to communicate a consistent conservation message and goals to their residents. This is especially important if they have already been messaging and educating collectively and consistently since the Governors declaration of emergency all the way back to January 2014.

We hope our feedback will be helpful in the challenging process of setting the regulatory concepts that we will be implementing going forward to respond to this historic drought. We appreciate the opportunity to work more closely with the State to help integrate our experiences with water conservation so that we can all work collectively to better manage California's water supplies in a more sustainable manner. Please contact Dan Martin at (925)931-5523 or [dmartin@cityofpleasantonca.gov](mailto:dmartin@cityofpleasantonca.gov) if you have any additional questions.

Regards,

Daniel Smith  
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City of Pleasanton

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