



CITY OF DALY CITY

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July 11, 2014

via electronic & US mail

Jeannie Townsend
Clerk of the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95814-0100
commentletters@waterboards.ca.gov

Dear Ms. Townsend:

The City of Daly City appreciates the opportunity to comment on the Board's pending emergency rulemaking consideration regarding "Prohibition of Activities and Mandatory Actions During Drought Emergency".

By way of background, the City of Daly City is located in north San Mateo County and shares its border with the City and County of San Francisco. Daly City is the largest municipality in San Mateo County with a population of 102,820 residents and 22,553 water service connections. Approximately 55% of Daly City's water supply is provided by the San Francisco Public Utilities Commission with the remaining 45% from five active groundwater wells. Daly City owns and operates a Tertiary Recycled Water Facility through its subsidiary, the North San Mateo County Sanitation District, and delivers full Title 22 compliant public contact irrigation water to the Olympic, Lake Merced, San Francisco and Harding Park Golf Courses along with Westlake Park and Marchbank Park Athletic Fields and landscaped medians along John Daly and Junipero Serra Boulevards. Recycled water operations have been in service since August 2004 in keeping with the City Council's policy of preserving the Westside Basin Aquifer for drinking water purposes.

The City of Daly City cautions the State Board in applying a "one size fits all" approach in its rule making toward achieving water conservation goals. At the start of the 1976 Drought, Daly City's population was just under 70,000 with a gross per capita use of 104 gallons per person per day. Today, Daly City's population has increased by 46% yet its gross per capita consumption is 70 gallons per day, an almost 33% reduction. Much of these savings are attributable to residents maintaining a strong conservation ethic over the last two droughts, land use, climate and continued aggressive public investment toward efficient water use. Furthermore, the State Board should know that 91% of Daly City's accounts are single-family or multi-family and Daly City's residential per capita use is 48.8 gallons a day. In fact, among all water customers in Daly City, 73% of all our customer accounts are using 9 ccf or less each month. Since San Francisco's call to voluntarily conserve 10%, Daly City

residents have reduced local water demand by 10.44% from last year, with a corresponding 20% reduction in purchases from San Francisco.

While Daly City acknowledges the State's call to conserve water, the above numbers note that very little water is being used for irrigation purposes. Daly City is in a position to enact stringent outdoor restrictions, but the State Board should note those savings will most likely not achieve overall target reductions sought under its proposed rules. Daly City respectfully requests the State Board's consideration of the conservation efforts achieved locally by our community, and to keep these factors in mind when reviewing and evaluating monthly monitoring reports from our agency.

Daly City appreciates the opportunity to provide these comments and thank the State Board for its consideration.

Sincerely,



Patricia E. Martel
City Manager

cc: Mayor and Members of the City Council
Bay Area Water Supply and Conservation Agency