July 14, 2014

Via Electronic and U.S. Mail

Jeanine Townsend
Clerk to the Board
STATE WATER RESOURCES CONTROL BOARD
Post Office Box 100
Sacramento, CA 95814-0100
commentletters@waterboards.ca.gov

Re: Comments to SWRCB Proposed Emergency Drought Regulations and Penalties - Section X.2. Mandatory Actions by Water Suppliers

Dear Ms. Townsend:

The Mid-Peninsula Water District (MPWD) is a California special district, providing water distribution services to 8,000 customers within the cities of Belmont, San Carlos, and Redwood City, and the County of San Mateo.

The MPWD receives its entire water supply from the San Francisco Public Utilities Commission (SFPUC), operator of the Hetch Hetchy regional water system.

MPWD customers have reduced their water consumption by 10%+ in response to active communications since February 2014 concerning the drought, including water conservation messages, restaurant "water on demand" tents, bill stuffers, newsletters, MPWD website postings, and newspaper advertising. This is in addition to a more than 15% water consumption reduction since 2004.

The MPWD has been and continues to be proactive with its water conservation programs, offering Lawn-Be-Gone rebates ($2 sq. ft., no cap), HET (High Efficiency Toilet) rebates, and Washing Machine rebates.

Comments to the proposed mandatory regulations referenced above are as follows:

1. There was not a sufficient notice period for review and response to the proposed regulations.
2. State funding should be made available for the added significant responsibilities required by the mandatory regulations, e.g., public education and outreach, added monitoring and reporting, increased water conservation programming, and development of a Water Shortage Contingency Plan.
3. The MPWD does not have enforcement abilities within the communities it serves (the City of Belmont, the City of San Carlos, and the County of San Mateo) and must coordinate accordingly. Staffing impacts are obvious. The MPWD does not have available funding to subsidize enforcement. Will state funding be available to mitigate the impacts?

Sincerely,

Tammy A. Rudock
General Manager