



Public Utilities

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July 15, 2014

California Environmental Protection Agency
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Re: Proposed Emergency Water Conservation Regulations

Dear State Water Resources Control Board Members,

The City of San Luis Obispo takes exception to the proposed Emergency Water Conservation Regulations to be considered by the State Water Board at its July 15, 2014 meeting.

The City has implemented aggressive water conservation programs since the 1986-1991 drought. Community education efforts, rebate programs, toilet retrofit upon sale requirements, and volume based sewer and water rate structures assisted in influencing the community's water use practices since that time. Water consumption dropped from a high of over 180 gallons per capita day (GPCD) in 1988 to 105 GPCD in 2013. Per our adopted Water Shortage Contingency Plan, Stage 1 drought reduction target is 115 GPCD; our City is currently at 94 GPCD without mandatory rationing due to the community's conservation ethic, and the programs and services available to assist citizens use water efficiently.

Additionally, the City implemented multi-year water rate increases to pay for a \$200 million supplemental surface water project to essentially eliminate reliance on groundwater and has add water supply reliability to the water system. In fact, the City of San Luis Obispo's computer model used to predict water supply under worst case drought conditions show that there is a 7 year supply of water available at this point in time; per our Water Shortage Contingency Plan, mandatory restriction would be implemented when there is a projected three year supply available.

While this was a well-intentioned mandate, it did not take into consideration communities such as San Luis Obispo who previously took action to put strong drought and conservation policies in place and secured additional local water supplies as a drought contingency measure. Requiring an additional water use reduction upon a community that has already made those reductions is not equitable.

With Respect,

Wade Horton
Deputy Director Utilities | Water Division Manager

Cc: Carrie Mattingly, Utilities Director
Ron Munds, Utilities Services Manager