

To Jessica Bean,

Prior to my comments about the proposals for Urban Water Suppliers, I want to express my concern about the date this proposal arrived to many of the water purveyors and the deadline date we have to submit comments. I received the information via email on April 7, 2015.

The deadline date of April 13, 2015, leaves only six days to be able to provide comments, and to come up with examples of other ideas that may achieve the 25% reduction with a much more equitable table for water consumers (GPCD) and the related Conservation Standard you have offered.

On the other hand perhaps you are only looking for quick responses without the total detail at this time. (I'm hoping that this is the case).

Subjects in the letter of immediate concern for me are as follows:

On page one, the first paragraph the Executive Order, it says; The executive order stipulates the 25% reduction in water use as compared to 2013, but proposes flexibility in how to achieve this reduction in recognition of the level of the conservation already achieved by many communities around the State.

Third paragraph : The Executive order directs the State Water Board to consider the relative per capita water usage of each water suppliers' service area, and have those areas with higher per capita use achieve proportionally greater reductions than those with low use.

I completely agree with what the order says in the two sentences, but the table that your presenting does not exemplify what the order talks about.

The table that your presenting won't work. In no uncertain terms, the table is not equitably getting to the bottom line, which is per capita use. Your rewarding higher users by allowing them to use more water per capita because that's what they've been using. It's actually punishing the people that have been very proactive in their conservation efforts.

Here are just three examples:

For a group that uses under 55 gpd/per capita you want a 10% reduction in usage. That amounts to an acceptable level of usage to 49.5gpd.

For a group that uses 110-165 gpd/per capita you want a 25% reduction in usage. That equates to an acceptable level of between 82.5gpd - 123.75 gpd.

For a group that uses over 165 gpd/per capita you want a 35% reduction in use. That equates to an acceptable level of incredibly high usage. Users in this tier are currently using anywhere from 165gpd + to 584gpd. A 35% reduction is absurdly inadequate.

The table needs many more tiers to achieve any sense of fairness, and the emphasis needs to be on the higher users not the low and low-mid range.

I created two quick tables myself, using the list of Urban water suppliers and their water usage records. My first table has 10 columns. This table consist of conservation standards of 0%, 5%, 10%,15%, 20%, 25%, 30%, 35%, 40%, 45%.

My second table consist of 13 columns. This table consist of conservation standards of 0%, 5%, 10%, 12.5%, 15%,17.5%, 20%, 22.5%, 25%, 30%, 35%, 40%, 45%.

To achieve the goal of the "Executive Order" your table has to be expanded in number of columns and the percentage of restrictions has to be increased to the higher users.

Its not simple but it isn't rocket science either.

Thank you.

Sincerely,
Kevin Gilman / Field Manager
Sweetwater Springs Water District