

Jessica: Here are our initial comments:

1. September 2013, not September 2014, should be used as the basis for placement of the 411 urban water suppliers into the various Conservation Standard categories (tiers). This sets the benchmark before many agencies started to implement more serious water conservation measures.
2. The Conservation Standard categories (tiers) are unfair in that they jump as much as 10% for a 1 GPCD increase (such as from 165 GPCD to 166 GPCD). We recommend having 11 categories (tiers) that more gradually step from the 10% Conservation Standard up to the 35% Conservation Standard. Each step would be 2.5%.
3. Clarification needs to be made between water “production” data, and water “usage” or “sales” data. For water purveyors, water production is the amount of water put into the distribution system from wells, treatment plants, State water turnouts, etc. Water usage or sales on the other hand is the total of all the customer meter reads. This is the water coming out of the system. All of the regulations should refer to usage or sales, (not production).
4. The regulation to limit outdoor irrigation/watering to 2 days per week is totally ineffective. Customers can simply run their irrigation system 2 or 3 times longer on those 2 days and actually end up using more water. The regulations regarding outdoor irrigation should be more specific and include measures that will actually result in less water usage.
5. In most cases reducing commercial water usage means cutting commerce which means cutting tax revenues and destroying our State and local economies. The SWRCB should provide a list or menu of possible commercial water restrictions that make sense. For example if a hotel has low flow toilets, low flow shower heads, aerators on their faucets, only launders linens for new guests (instead of daily) there is nothing else they can do to conserve water except turn away customers which is an unacceptable solution. However, a regulation that states they must retrofit all toilets and shower heads to be low flow (within a certain time frame) makes a lot of sense.
6. Reporting requirements for water agencies should be kept to an absolute minimum so we can use our time and resources focusing on achieving conservation not writing reports.

Sincerely,

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