

Jessica,

We are a small water system with only 584 connections in a primarily rural suburban area with a population of less than 1,800 people. Most of our homes are on large hillside lots and in an area prone to wildfires and mudslides. About 80% of our water is used for landscape irrigation to help mitigate these hazards. Since it appears that the new regulations will not exempt systems of our size, we have the following concerns:

1. The draft does not appear to take into account the size or type of the properties that we serve
2. The draft does not appear to recognize the need to reduce the risk of wildfires and mudslides
3. The draft does not appear to recognize that our customers are on septic systems so that virtually all of our landscape and household water returns to the local groundwater basin underlying our service area from which we obtain 100% of our supply
4. Our District does not use imported water and has not needed any supplemental supplies
5. We have been promoting conservation and water use efficiency since 2006 so the use of 2013 as a base year does not reflect the prior successful effort of our customers to reduce water use
6. Assessments to the water system for non-compliance up to \$10,000 per day are not appropriate for a small system like ours unless we are also given the authority to turn off or restrict the water to non-compliant users who ignore our warnings

We would appreciate it if the Water Board would give more thought to the regulation of water systems like ours that are quite different from the large urban water supplies whose customers are in more densely populated areas with much less or no landscaping to maintain on an individual basis.

Best regards,

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