

Dear Ms. Bean.

We respectfully request that you consider the following as you develop the regulatory concepts to implement the Governor's April 1, 2015 Executive Order.

In order avoid a moratorium on the construction of new residential dwellings and commercial buildings, we are requesting the SWRCB provide an allowance for the increased number of new services that have been added to every water system since 2013. We request that the adjustment to the Conservation Standard for each water system be based on the number of new services installed between 2013 and 2015. The comparison would be on an Equivalent Dwelling Unit (EDU) basis, where 1 residential meter equals 1 EDU. To show this increase, we would like to see an available entry for the 2013 total services per month and an entry for the 2015 total services per month on the Urban Water Supplier Reporting Tool for a month to month comparison. These numbers would be the bases of any proportional adjustment of each water supplier's reduction from 2013 use.

Also, due to the upswing in new development for some communities, construction water for the installation of new pipelines would create an increase in total overall water demand that would hinder an agencies ability to meet their reduction requirements. In order to avoid a building moratorium, we request that the SWRCB provide an adjustment per month to the calculation of each water supplier's reduction from 2013 use equivalent to gallons per month of construction water used in 2015 versus 2013. To show this adjustment in water used for construction purposes, we would like to see an available entry for the 2013 construction water used per month and an entry for the 2015 construction water used per month on the Urban Water Supplier Reporting Tool.

The aforementioned is consistent with the Executive Order directing the State Water Board to consider the relative per capita water usage of each water suppliers' service area while calculating each water supplier's reduction from 2013 water use.

We would also ask that you establish a maximum gallons per hour for the microspray drip irrigation systems being permitted under the Executive Order for new developments in order to provide clarity to all parties since some microspray systems can emit as much water as popup lawn sprinklers.

Thank you very much,

Mike Yeraka
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