

Dear Ms. Bean,

Thank you for the opportunity to provide suggestions on the proposed regulatory framework to impose restrictions to achieve a statewide 25% reduction in potable urban water use through February 2016. We have the following comments/suggestions:

Apportioning Water Supplier Reductions

1. Consider removing the conservation standard for the lowest tier water use (under 55 gpcd).
 - It is unreasonable to require greater reductions from those with already low water use and especially from those with water use at or below what is considered essential for human health and safety. [29 public water agencies that buy from the SWP quantified their needs to meet demands for drinking, hygiene, and sanitation (collectively 55 gpcd), plus fire protection. Source: Central Valley Project and State Water Project Drought Operations Plan and Operational Forecast April 1, 2014 through November 15, 2014, Balancing Multiple needs in a Third Dry Year, April 8, 2014]
2. Consider increasing the conservation standard for the largest water users and add tiers for water users above 165 gpcd (i.e., 165-200 gpcd, 200-250 gpcd, etc.)
3. Consider apportioning the conservation standard for small water suppliers similar to proposed apportioning for urban water suppliers.
 - Under the proposed framework, small water suppliers would be required to achieve a 25% water savings regardless of their current water use.

Compliance Assessment

Determination of compliance is proposed to be based on reported reduction of water production. Instead, please consider evaluating compliance based on reported reduction of water consumption for both urban water suppliers and small water suppliers. Water suppliers are currently collecting and reporting consumption and this would streamline data compilation and reporting requirements.

Please let me know if you have any questions or would like further clarification on our comments.

Sincerely,

Nola Engelskirger, PE

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