April 13, 2015

Jessica Bean
State Water Resources

Re: Comments on Proposed Regulatory Framework for April 1st Executive Order

Dear Ms. Bean:

Thank you for the opportunity to provide comment and feedback for the proposed regulatory framework. As a small municipality that provides water supply to its residents and businesses, we are particularly sensitive to the statewide drought issues and have particular interest in finding long-term sustainable options for our water supply.

With only 1600 service connections, we fall under the Small Water Supplier classification. Since the 2014 Orders, the City has enacted a Stage 2 Drought Ordinance and has been conserving water usage. Residential usage has been reduced an average of 25%. As we continue to conserve, we would like to make the following comments for the proposed regulations:

* Provide absolute clarification that the 25% is a STATEWIDE goal. While our community will continue to conserve, greater restrictions on small communities would only create minimal impact. Larger water suppliers need to bear the heavier burden as that is a much larger impact and have the greater affect, particularly at a Statewide level.
* Provide some relief or exceptions to certain businesses and industry. It is appreciated that reporting information is mainly residential usage. For communities such as ours, wherein we are comprised of about 50% residential and 50% commercial/industrial, it is more difficult to achieve a total 25% reduction when our commercial/industrial sectors need the water use to stay in business.
* Clarify at a Statewide level that water use restrictions may vary by locality. There are many different ways to achieve water use reduction. People become panick stricken by varying media information such as no use of water every other day. Our community has achieved reduction without mandatory times/days restrictions.
* Release additional funds for water conservation projects for commercial/industrial and for municipal, particularly for smaller communities. Many grant programs out there is targeted for residential conservation. However, with the new regulations also targeting commercial/industrial and other institutions, there needs additional sources. Our community would not receive grants competing against the larger cities because of its size and “less impact”. A separate funding allocation for smaller communities would be helpful to assist us. In addition, small community
should be defined based on population or by service connections, not on “median household income”.

Thank you for your assistance. If you need any additional information, you may contact me at (805) 688-5177 or via email at roseh@cityofbuellton.com.

Sincerely,

Rose Hess

Rose Hess, PE  
Director of Public Works  
City of Buellton