

Ms. Bean.

The State Water Board expressed interest in receiving feedback on their regulatory concepts as well as other ideas on how a 25% reduction could be structured.

I wrote and administered my first water rationing program for the City of Martinez in 1977, in my capacity as Water Superintendent. I have written and administered programs since that time for the cities for whom I have and am working. I have been a Water Conservation Practitioner (AWWA) since 1999, soon after the certification program was initiated.

Here are my comments and ideas on the proposed framework.

- As I was writing the Water Conservation staff report for our April 20th City Council meeting, I was thinking of how difficult it is to write a report when information is being continuously provided and State regulations are still evolving. Based on the proposed State Water Resources Control Board Water Conservation standard regulations sent out Wednesday, we have a little better idea of what reduction we are going to target. Thank you for getting it out in a timely manner.
- As a water conservation person, I like the lawn/turf watering criteria adopted, especially for medians and businesses. When we recover from this drought, I would like to see the medians and businesses lawn/turf criteria retained.
- I also like the Conservation Standard that reflects water conservation efforts already made (10 – 35% scale). The City of Pittsburg has invested about \$6 million on our recycled water distribution system. The funding came primarily from the City's funds, although we did receive some grants.
- In 1977 Contra Costa Water District (as whom the City of Pittsburg is a raw water customer) set requirements that Industrial customers reduce their use by 10%, municipal customers reduce their use by 25%, and irrigation customers reduce their use by 50%. This was done on an annual basis. We all met that target. The City of Martinez reduced its use by 27%. This was done by a reduction of about 10-15% in the winter and 35% in the summer. I am concerned that State's up-to-\$10,000 per day fines will not take into account that water use reduce percentages are most likely to be higher in the summer, as lawn watering is reduced. I would rather see something based on end-of-the year exceedances. I would also like to see this scaled based on utility size. \$10,000 per day is more significant for smaller agencies. For large agencies, it may not be significant.
- The time frame for the % reduction is not defined. Will it start before regulations are effective on June 1, 2015?

I am concerned, like the State Water Board, about the available water supply and appreciate the State Water Board's efforts to bring consistency to all of Urban California's water conservation efforts.

Sincerely,

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Director of Water Utilities
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If the fines are based on a cumulative rolling average, everyone should have their best chance to meet water conservation criteria in June and then they would see what they had to do to continue to meet their water conservation goal.

We all want something practical, achievable and effective.

Thank you for the information provided.

Regards

Walter Pease
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