



## CITY OF FULLERTON

Public Works Department - Engineering Division

April 22, 2015

Ms. Jessica Bean  
State Water Resources Control Board  
1001 I Street 24<sup>th</sup> Floor  
Sacramento, CA 95814

Subject: Input on Regulatory Concepts to Implement the Governor's April 1, 2015 Executive Order

Thank you for the opportunity to submit comments to your April 18, 2015 Draft Emergency Regulation for Urban Water Conservation. The City of Fullerton supports the intent of the Governor's executive order B-29-15 to reduce urban water use in this time of drought. Fullerton provides the following comments for your consideration:

1. The State Water Board should adjust the Residential per capita per day (R-GPCD) for agencies receiving Indirect Potable Reuse (IPR) to promote equity and expanded use of recycled water. A suggested method would be to subtract each agency's IPR from their total production. Please note this method is not currently reflected in Fullerton R-GPCD calculation.
2. R-GPCD metrics should be defined to use total production minus system water loss or sales consumption data. We have gone back and recalculated our R-GPCD using this method and it resulted in placing Fullerton in tier six; 24% reduction. It seems some of the other water agencies are already using this method. (We also revised our residential use percentage based on more up to date information rather than an estimate, which was the only data available at the time of the reporting deadline).
3. We recommend a waiver be granted to large Industrial users. We are not suggesting water used for irrigation be waived, but rather water used strictly in the Industrial process. This would allow companies to continue to do business and keep people employed.

### THE EDUCATION COMMUNITY

Again, we appreciate the opportunity to provide comments on the implementation plan for the Governor's Executive Order. Please call me at (714) 738-6382 with any questions regarding the above comments.

Sincerely,

A handwritten signature in black ink, appearing to read "David Schickling". The signature is fluid and cursive, with a long horizontal stroke at the end.

**David Schickling**  
**Water System Manger**