



4305 Santa Fe Avenue, Vernon, California 90058
Telephone (323) 583-8811

April 22, 2015

State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Re: Mandatory Conservation Proposed Regulatory Framework

Dear State Water Resource Control Board Members:

Thank you for the opportunity to comment on your Mandatory Conservation Proposed Regulatory Framework. The City of Vernon (City) supports the Governor's call to reduce urban water use and appreciates the State Water Resource Control Board (SWRCB) efforts to solicit local water agency input on how to achieve the water conservation target.

While supportive of the SWRCB's proposal, the City has the following comment on the draft regulatory framework:

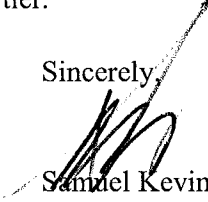
Modification of Tier for Water Purveyors Delivering More Than Twenty Percent (20%) of Their Total Water Production to Commercial, Industrial, and Institutional Customers

The City has performed a detailed review of the proposed regulations and noticed that the SWRCB allows agencies delivering more than twenty Percent (20%) of their total water production to commercial agriculture to request a modification of their tier. The City, like many other Cities in the State of California, have a high percentage of Commercial, Industrial, and Institutional Customers in their service area. Commercial, Industrial, and Institutional processes, like the commercial agricultural sector, require a critical amount of water supplies. Although water purveyors will continue to work with the business community to gain efficiencies in the use of water, the opportunities to reduce water use may be limited due to the requirements of manufacturing and industrial processes. It is important to recognize the importance of maintaining employment and economic vitality generated from the Commercial, Industrial, and Institutional sectors.

Exclusively Industrial

It is the City's recommendation that those water purveyors delivering more than twenty percent (20%) of their total water production to Commercial, Industrial, and Institutional Customers be given the opportunity to request a modification of their tier.

Sincerely,

A handwritten signature in black ink, appearing to read 'SKW', is written over the word 'Sincerely'.

Samuel Kevin Wilson, P.E.

Director of Community Services and Water

SKW/sr