

To whom it may concern:

Please accept this email as Bakman Water Company's written comments for the State Water Resources Control Board regarding Draft Regulations Implementing 25% Conservation Standard. Bakman Water Company has the following questions concerning the New Water Restrictions, specifically in regards to Monthly Monitoring Reports:

1. Are there any credits given to water utilities for recharge? For example, if a utility recharges X amount of water (to offset groundwater pumping), are any deductions made to the production numbers reported based on the recharged amount?
2. Would utilities that fall below the 3,000 acre foot threshold (assuming they are also under 3,000 service connections), due to conservations efforts and production cutbacks still be subject to assigned conservation standards and monthly reporting? For example, if a utility has a production of 3,750 acre feet of water in a year but are required to cut 36%, then if achieved the water utility would have an annual production of 2,400 acre feet which would be under the parameter of 3,000 acre feet.
3. How can a water utility best account for new construction where production numbers would be increased by each new unit delivered? For example, if a system adds 80 new homes in a year, the new production numbers would increase in a manner that wouldn't be proportionally reflected in the Residential Gallons-Per-Capita-Day equation as given.
4. Related to the previous question, how can a water utility best account for growth? If a utility bases a population figure off of United States Census Data for Census Tract calculations, which numbers were taken from 2010 Census data, can a population growth rate be used to determine current population numbers (as many Urban Water Management Plans calculate population in this manner)? For example, if 2010 Census Data lists 13,960 as a population figure and a 1.1% population growth factor is used, then the current population is estimated to be 14,705 people. This would take a 300 gallon R-GPCD (all other numbers remaining the same but replacing the 2010 Census population with one using the estimated growth rate) to 285 gallons R-GPCD. Would this be an acceptable form of population estimating?
5. How can a water utility best account for service areas with a large amount of High-Density Zoning or Commercial Zoning, especially as how it relates to the residential percentage calculation?
6. How can a water utility best account for fire department flow tests and flushing, especially if the utility isn't given notice? This would represent an accounted for water use that is beyond the utility's control. Also, should a water utility state in Monthly Monitoring Reports when a fire occurred and fire protection services were used? How would the Board weigh this information?
7. How can a water utility protect itself when pools are drained without approval? For example, if a local building or planning department (separate from water utility) approves a pool draining and when the water utility responds because of the refill, they are told the house is being sold and that an appraisal/inspection cannot be done with an empty pool, then how should the utility respond? Or how about a similar situation where the pool is drained for mosquito

abatement purposes? We would appreciate advice on how a water utility should treat this situation.

8. How can a water utility best monitor individual usage if the system is not yet entirely metered? For example, Bakman Water Company received grant funding as a Disadvantaged Community to install an automatic meter reading system and meters and is diligently installing at a pace that meets the project schedule but that pace is also dictated by State reimbursement schedules. The ability to classify high usage users and apply efficient water pricing is limited by the number of meters in the system. Is there any consideration given to systems that are obviously working hard to install meters, but the benefits of those meters won't be fully realized at once?

The DRINC website lists factors that must be accounted for to make the R-GPCD water use data appropriate and relevant for comparisons across water suppliers, including factors related to climate, population growth, population density, socio-economic measures and water pricing. All of these factors directly relate to Bakman Water Company and can be inferred from our questions above. However, it has not been stated how these factors would be accounted for in determining the Tiers and Mandatory Conservation Standards. While we understand the importance of sending a direct message in a time of need due to the severity of the drought, we would hope that when issuing proposed standards distinct to individual utilities in an environment open to interpretations from the press, those factors that affect relevancy should also be highlighted.

Despite any issues or questions Bakman Water Company may have with the manner that the proposed restrictions and standards were presented, we will continue to work alongside our customers to achieve reductions and promote conservation goals now and in the future. Bakman Water Company is considering making adjustments to its monthly monitoring reports through resubmission, but would like clarification and answers to the questions posed herein prior to resubmitting. Any comments or answers to the questions would be greatly appreciated.

Best Regards,
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BAKMAN WATER COMPANY