



To Whom It May Concern: I thought I would share with you some more about our experience at Sweetwater Springs Water District, a relatively small urban water supplier with approximately 3500 connections and supplying approximately 800 acre-feet per year. The District's gpcd during the calculation period is approximately 80 gpcd, we have been put into the 16% tier and we have no problem with that. However, the State Board is focusing on water use restrictions that affect sales and not necessarily production which is what the tiers address. Sweetwater Springs Water District has achieved a 15% reduction in production from July 2014 through February 2015. During that period our customers have done better than that, but you don't ask for sales information. Our customers are doing great; it's our pipes that are the problem (23% system losses). Restricting our customers more or somehow getting them to cut down further on their water use will likely have little effect on our production as our system has losses through undiscovered leaks regardless of how much water our customers use.

We have known for a long time that system losses are a big problem for us. We have initiated an annual capital improvement program since 2008 (and annual rate hikes for funding) to replace our pipes, focusing on the leakiest sections and have brought the water loss percentage which was at 30% in 2009 down to 23% now, and we are awarding a construction contract for this year's project at our next Board meeting - expected cost to be approximately \$850,000, which is a lot for a small district like ours. We are purchasing correlation equipment to better chase non-surfacing individual leaks - we repair approximately 150 leaks per year; down from 300 per year in 2009 - and we expect use of the correlation equipment will give us another tool to cut down on system losses.

We recognize our problems and we're doing our best to address them within our financial and physical means. And I understand the State Board's focus on production data as that is the real measure of total water use. However, for districts like ours, more and more restrictions on our customers are not going to achieve much as the system losses happen prior to getting to their home or business. We'll accept any assistance we can get to reduce our system losses which are the real problem for Sweetwater Springs Water District. I hope you take this into consideration as we all move through this new regulatory process during the drought that we all hope is over next winter.

Thanks,
Steve Mack, General Manager
Sweetwater Springs Water District
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