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May 2, 2015

State Water Resources Control Board
Electronic Submittal



RE: Comment Letter – Emergency Conservation Regulation

Dear Board Members,

Thank you for this opportunity to comment on the proposed Emergency Conservation Regulation.

Valley Water Company is a none-profit mutual water company, incorporated in 1910, located in the City of La Canada Flintridge. We have a total of about 3,580 service connections with water production averaging 3,700 acre-feet annually, which is comparatively low. By the numbers, we are a small water utility. However, because our service area is comprised entirely of single family homes on larger size lots and with low population density, our residential gallons per capita day number is skewed disproportionately high. Our required 36% reduction is more reflective of the small number of people living in our service area than our volume of water produced. Furthermore, the City of La Canada Flintridge is a foothill community. To achieve 36% reduction may jeopardize public safety, creating fire hazards and slope stability issues.

California is in a drought and we have made provisions to double up our conservation activities, to do our part. However, given our unique situation, we are asking the Board to please reconsider our reduction requirement. For point of reference, the Conservation Regulation requires a 25% reduction for small producers.

Your consideration is sincerely appreciated.

Respectfully,

Bob Fan
General Manager