



# CITY OF ARROYO GRANDE CALIFORNIA

May 4, 2015



Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

Subject: **"Comment Letter – Emergency Conservation Regulation."**

Dear Members of the Water Resources Control Board:

The purpose of this correspondence is to provide comments on the proposed text of the Draft Resolution adopting Emergency Regulations for Statewide Urban Water Conservation.

The City of Arroyo Grande appreciates and supports the efforts of Governor Brown's office and the State Water Board to address the on-going statewide drought. The Arroyo Grande City Council has been pro-active in addressing our long-term water supply stability through water conservation since May of 2010 at which time permanent mandatory water use restrictions were adopted. Many of the end-user requirements proposed by the State have been previously adopted by the City of Arroyo Grande; however additional efforts will be required by the City to meet the City's water reduction target proposed by the State Water Board.

The City of Arroyo Grande is requesting the following modifications be made to the proposed text of the Draft Emergency Regulations for Urban Water Conservation:

1. Delay the implementation date of the proposed regulations until July 1, 2015. This implementation date will allow for agencies to evaluate the final regulations and to craft and adopt appropriate response measures to be adopted through our City Councils and Boards of Directors.
2. Make accommodations for monthly commercial, industrial and institutional reporting requirements for water purveyors that bill customers on a bi-monthly basis. We can only provide monthly use reports for our commercial, industrial and institutional customers if we switch to monthly meter reading and billing, which would be a significant and costly endeavor for our agency.

3. Per capita water use target should only be evaluated for the purposes of meeting the mandated tier reduction rate for a 12 month compliance period. Comparisons on a month to month basis have the potential to vary greatly due to atmospheric conditions and weather patterns. Month to month comparisons for compliance purposes would be setting the water purveyor up for non-compliance due to conditions beyond our control.
4. The State Water Board should consider water conservation measures and actions taken and implemented by a water purveyor agency prior to taking any punitive action on that agency if the water conservation targets are not met.

Thank you for the opportunity to comment on the proposed regulations. If you have any questions, please contact me at 805-473-5466 or via e-mail at [genglish@arroyogrande.org](mailto:genglish@arroyogrande.org).

Cordially,



Geoff English  
Director of Public Works

C: Bob McFall, Interim City Manager  
Teresa McClish, Community Development Director  
Shane Taylor, Utilities Supervisor