



City of Pittsburg
Water Utilities Department
65 Civic Ave.
Pittsburg, California 94565



December 1, 2015

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

commentletters@waterboards.ca.gov

Thank you for the opportunity to comment on the proposed regulations.

I have been very involved in water conservation and supply reduction programs since I wrote and administered my first mandatory water conservation program in 1977 for a municipality. I understand the benefits of water conservation and the level of effort, and cost, to do a water conservation/ water use reduction program.

It is proposed that an extension of the Emergency Regulation to conserve urban water supplies in 2016 may be needed depending on the amount of precipitation (both rainfall and snow accumulation) that the State receives during the upcoming winter months. The purpose of this workshop has solicited input on the types of changes to the emergency conservation regulatory framework the State Water Board should consider if such an extension is necessary.

The State Water Board is interested in receiving public input on the following questions:

1. What elements of the existing Emergency Regulation, if any, should be modified in an extended Emergency Regulation?

- Some of the “new” regulations were adopted by water agencies years ago. Rather than having the SWRCB “police” the thousands of water agencies in California, let the “20 x 2020” and the Groundwater Management rules already in place drive the conservation effort.
- The “no grass” in medians, commercial development and sidewalk strips should be permanent.
- Separate irrigation water meters for single family homes would be a very costly idea with very little benefit. It’s easy enough to figure outside usage without a separate water meter by comparing it to winter use. It would also increase utility costs to require that the separate residential irrigation meters be read.

2. What additional data, if any, should the State Water Board be collecting through the Emergency Regulation and how would it be used?

- The data currently being collected, beyond water supply volumes, are burdensome and not productive. Please eliminate them for those agencies that are meeting their reduction requirements.

3. How should the State Water Board account for precipitation after January 2016 in its implementation of any extension of the Emergency Regulation?

- 60% of the rainfall in California occurs in February and later. Regulations should not be implemented until the beginning of April when we have had the opportunity to see to see what actual water supply could be.
- Please adjust the regulations to consider the investments the City has already made to provide emergency and drought water storage. It is a financial burden to have made these investments and then have to significantly cut back in the water sales (and revenue). This affects the ability to pay for the storage project without a significant rate increase, or alternately, affecting our ability to fund much needed capital replacement.

A study from the Public Policy Institute of California, argues that the growing demand for water makes it imperative to reform the state's system of allocating this essential resource. The PPIC report says the drought has shown the water rights system to be "fragmented, inconsistent, and lacking in transparency and clear lines of authority."

Please expend your efforts toward resolving this issue.

Sincerely,

A handwritten signature in blue ink that reads "Walter Pease". The signature is written in a cursive style with a large initial 'W'.

Walter Pease
Director of Water Utilities
(925) 252-6966