

Comment Letters

From: Patrick Sweetland [mailto:psweetland@dalycity.org]
Sent: Wednesday, January 06, 2016 1:24 PM
To: Frevert, Kathy@Waterboards
Cc: Michael Hurley (MHurley@bawsca.org)
Subject: Comments on Proposed Regulatory Framework

Thank you for the opportunity to comment.

Calculations from the State Board staff note a potential 3% reduction in statewide water savings may result from the proposed refinements. While the number appears minimal on its face, the question arises as to the overall impact on the state's 25% savings goal. It would be helpful to explicitly provide reduction in statewide savings will not in turn shift the redistribution burden to other agencies now complying with their target reductions.

Growth consideration appears only to reflect new construction in the form of new meters. This may be limiting the scope of growth within a community. The refinement out to also consider modified in-fill development that may not be a new meter but new development provides for increased usage. Growth should also recognize vacant units that have subsequently come back on line since the 2013 base year. The economic decline resulted in a number of foreclosures and vacant units in our community, and it has taken time for these once vacant units to become re-occupied.

It is unclear how the State Board intends to expand urban water use beginning in March 2016 through October 2016. Of particular concern is accounting for tiered use reductions during historically low usage months representing indoor use. It would be helpful for the State Board to recognize cumulative savings over the extended period being proposed as individual monthly tiered reductions may not be readily achieved.

Thank you, Ms. Frevert, for your consideration of these comments.

Patrick Sweetland, Director
Department of Water and Wastewater Resources
City of Daly City