

Jay T. Spurgin
Public Works Director

April 13, 2015

Eric Oppenheimer
State Water Resources Control Board
1001 I St., 24th Floor
Sacramento, CA 95814

VIA E-MAIL:
Jessica.bean@waterboards.ca.gov

Re: Mandatory Conservation - Proposed Regulatory Framework

Dear Mr. Oppenheimer:

The City of Thousand Oaks appreciates the opportunity to provide comments on the Water Board's Proposed Regulatory Framework for mandatory urban water conservation. Thousand Oaks is located in Ventura County and the City system serves a population of approximately 51,000. The City is proud of its record in achieving water use efficiency; City water customers have reduced usage by over 20% in the last seven years.

The baseline period for apportioning water supplier reductions is a single month (September 2014). Per capita residential water use from this period is then used to place all 411 urban water suppliers into one of four tiers for conservation standards. We feel that using a single month could unfairly place an agency into a higher tier as a result of regional temperate zones. An example from our local community is the hot, dry and windy Santa Ana conditions we experience in the fall months that can result in very high water use, sometimes higher than summer months. A longer period from which an average per capita water use is determined would smooth out this type of local temperature variation.

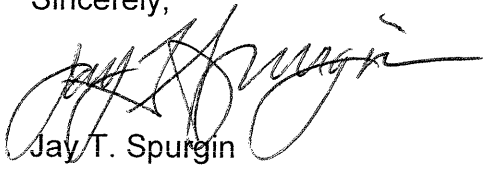
Per capita water use as a measure of conservation may also not be the fairest approach. Density of development in urban areas has a large effect on per capita numbers. Opportunities for greater water conservation in more densely populated communities where water efficiency measures have not been widely implemented may be missed due to a lower per capita value. Conversely, less densely populated areas that have already been conserving water may be given higher conservation standards that are unattainable. Perhaps a more fair approach would be to incorporate density along with per capita water use into the conservation standard tier structure.

**Mandatory Conservation –
Proposed Regulatory Framework
April 13, 2015
Page 2**

In addition, we are concerned about the requirement to report monthly usage for commercial, industrial and institutional (CII) customers. The City, like many other water agencies in the state, reads meters and bills on a bi-monthly basis. For Thousand Oaks, a more accurate reporting requirement would be on a bi-monthly basis.

Again, thank you for seeking input from local water agencies. If you have any questions or need additional information about our comments, please contact me directly at (805) 449-2444 or jspurgin@toaks.org.

Sincerely,



Jay T. Spurgin
Public Works Director

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