

Jessica,

Please consider my comments on your proposed regulatory framework.

1. Your proposed tiers, which are based on residential GPCD, are too broad to be fair. It is unrealistic to expect a water supplier with 60 GPCD to conserve 20%. Similarly, it may be possible for agencies in the upper end of each bracket to achieve the target conservation standard, but not for those agencies in the lower end of each bracket.
2. The brackets make no allowance for hydrologic region or ET factors.
3. Rather than focus only on residential GPCD, your focus should be on all urban water use. Governor Brown's executive order directs a 25% reduction in potable urban water use. It is not directed at residential use only.
4. Every urban water supplier was required to develop a 2020 GPCD target and a 2015 interim target in their 2010 Urban Water Management Plans. These targets include all potable water into the suppliers' distribution system. The Department of Water Resources has published these figures and they are available to the State Board. Some urban water suppliers have established regional targets that encompass several water suppliers' service areas as a region.
5. An alternative to your proposal would be to use the already published 2020 GPCD targets or 2015 interim GPCD targets and calculate the mandatory water savings on those data. By doing so you treat each agency fairly, you consider hydrologic region and you set achievable water conservation goals. Water suppliers that have established regional GPCD targets, as published by DWR, should be able to comply with the State Board's regulation either as an individual water supplier or as a region.

Thank you for the opportunity to comment.

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