



*"Small Town Atmosphere  
Outstanding Quality of Life"*

April 13, 2015

Ms. Jessica Bean  
State Water Resources Control Board  
California Environmental Protection Agency  
1001 "I" Street  
Sacramento, CA 95814

Via e-mail: [jessica.bean@waterboards.ca.gov](mailto:jessica.bean@waterboards.ca.gov)

**RE: Input on Proposed Regulatory Framework for Mandatory Water Conservation**

Dear Ms. Bean

The Town of Danville has reviewed the proposed regulatory framework for the Governor's April 1, 2015 Executive Order on the reduction in potable urban water use. The following comments are provided to the State Water Resources Control Board (SWRCB) for consideration:

1. Approaches to achieving a 25% statewide reduction in potable urban water use that would impose a greater responsibility on water suppliers with higher per capita water users is to require more drastic action for suppliers with a conservation standard of 35%. Efforts may include mandatory xeriscaping for residential properties or the prohibition of new landscaping in commercial or residential areas, which consume more water after transplanting.
2. Regulations should differentiate between tiers of high, medium and low per-capita water users. Actions that one water supplier may take in order to shift from a 4% reduction to a 35% conservation standard will need to be more stringent than water suppliers that have already reached an 18% water reduction and need to reach 20%. Those water suppliers whose customers have made significant progress towards water conservation should not be regulated in the same manner as water suppliers whose customers have a long way to go.
3. Water suppliers should disclose their list of actions (or planned actions) to achieve their required water reduction levels.
4. These actions should detail specific plans for potable water reductions in the commercial, industrial and institutional (CII) sectors.
5. No additional information should be required in the monthly conservation reports for urban water suppliers. It should be up to each water supplier to decide how to achieve their required reduction as long as suppliers meet their conservation standard.

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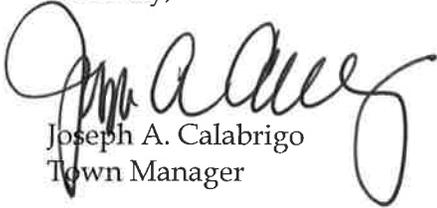
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6. Compliance with the required water reductions should be assessed based on usage compared to the baseline 2013 levels. Each water supplier and their communities should work together to determine how to meet the water conservation levels based on the needs and priorities of the community. The State should not dictate how water conservation should be implemented as long as the community meets the water conservation mandates. In some communities, maintaining landscaping in parks may be a higher priority than private golf courses, for example.
7. The Town encourages the use of informal enforcement, such as warning letters, before any formal enforcement efforts such as fines are issued.

If you have any questions regarding the Town's comments, please contact the Town Manager's Office at 925-314-3328.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Calabrigo", written over the typed name and title.

Joseph A. Calabrigo  
Town Manager

cc:

Assemblymember Catharine Baker  
Sam Caygill, League of California Cities, [scaygill@cacities.org](mailto:scaygill@cacities.org)