



# CITY OF CERRITOS

CIVIC CENTER • 18125 BLOOMFIELD AVENUE  
P.O. BOX 3130 • CERRITOS, CALIFORNIA 90703-3130  
PHONE: (562) 916-1301 • FAX: (562) 468-1095  
WWW.CI.CERRITOS.CA.US

April 22, 2015

OFFICE OF THE CITY MANAGER  
**ART GALLUCCI**

Ms. Felicia Marcus, Chair  
State Water Resources Control Board  
1001 "I" Street  
Sacramento, CA 95814

[Sent via e-mail to Jessica.bean@waterboards.ca.gov](mailto:Jessica.bean@waterboards.ca.gov)

Dear Chairwoman Marcus:

**Subject: City of Cerritos Comments Regarding Draft Emergency Regulation for Mandatory Urban Water Conservation**

The City of Cerritos appreciates the opportunity to provide comments on the updated approach reflected in the draft emergency regulation as well as comment on the specific regulatory language. We understand there are urgent challenges in California due to severe drought conditions and appreciate the efforts being taken to address the crisis. However, in an effort to create a response to the matter that is fair and effective we would suggest that each agency be provided the opportunity to determine and implement conservation levels and methods. We believe this would provide a more permanent and sustainable solution.

In addition to our request that local control be the first response to the drought crisis, we would ask that you consider the following points:

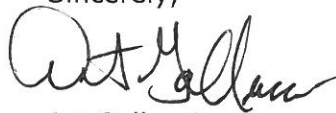
1. Delay the implementation until the State Water Board's legal counsel determines the impact of Proposition 218 on rate structure elements that may be necessary for local agencies to utilize in order to comply with the Governor's Executive Order. This would also supply a more reasonable time period to obtain community input on the methodologies that will need to be implemented.
2. Reconsider the establishment of a credit system that recognizes investments made by agencies in developing non-potable recycled water systems.
3. The enforcement provisions should include a process in which a water supplier could provide to the Water Board specific information and evidence that supports tier adjustments based on a local jurisdiction's unique circumstances.

Ms. Felicia Marcus, Chair  
State Water Resources Control Board  
April 22, 2015  
Page 2

4. Adjust the basis in which the conservation tier is determined so that it recognizes previous conservation efforts made by our water customers.

Thank you for reviewing our suggestions and we look forward to working with the Water Board further to collectively address the challenge of the current drought.

Sincerely,

A handwritten signature in black ink, appearing to read "Art Gallucci". The signature is fluid and cursive, with the first name "Art" being more prominent and the last name "Gallucci" written in a smaller, more connected script.

Art Gallucci  
CITY MANAGER

es