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Atascadero Mutual Water Company

ESTABLISHED 1913

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Clerk of the State Water Resources Control Board
commentletters@waterboards.ca.gov
State Water Resources Control Board
Sacramento, CA



Subject: Drought Emergency Regulation Package

Dear Ms. Bean:

We have reviewed the latest conservation standards established by the State Water Resources Control Board (SWRCB) for Atascadero Mutual Water Company and offer the following comments.

AMWC has had a very aggressive and effective conservation program in place since 1990. Since the 1970s, AMWC has employed a tiered rate structure to encourage its shareholders to conserve water. These rates, coupled with our pro-active conservation efforts, has resulted in the demand per capita in AMWC's service area declining from a high of 240 gallons per day per person (gpcd) in 1988 to 155 gpcd in 2014. Total annual water production has seen a steady decline also.

In February 2014, the AMWC Board adopted a resolution declaring a Stage 2 water shortage condition due to the persistent drought condition, with a use reduction goal of 15 - 35%. The current Stage 2 water shortage declaration requires, among other things:

- Alternate irrigation watering schedules;
- A prohibition on the use of potable water to irrigate landscaping and agricultural crops in a manner that causes surface runoff, over-watering, and other wasteful conditions;
- A prohibition on landscape irrigation during the hottest and windiest parts of the day;
- A prohibition on the washing of paved surfaces with water where sweeping would be an appropriate alternative; prohibits the washing of vehicles and other activities involving the use of a hose without a shut-off nozzle;
- Shareholders to repair of leaks and breaks in plumbing within 24 hours of discovery;
- Advising shareholders of prohibited and restricted uses and activities;
- Enforcing restrictions and prohibitions by issuing warnings and citing violators;
- Providing feedback to shareholders as to the effectiveness of the water use reduction programs

Under the Stage 2 water shortage declaration, AMWC shareholders reduced water consumption in 2014 by 15% compared to 2013 levels. The Governor has now mandated that AMWC shareholders reduce their water consumption by 28% compared to 2013 levels due to the severe drought conditions.

We are hereby requesting that you reevaluate the 28% conservation mandate that is being imposed on AMWC's shareholders. Atascadero was founded as a self-sustaining, agrarian community. The average lot size in our service area is 1.5 acres. Many of our shareholders have livestock, small orchards, vineyards, and large vegetable gardens. It is not reasonable to compare AMWC's per capita use with other cities in San Luis Obispo County that consist of small lots typical of urban areas.

AMWC shareholders recently spent over \$40 million to participate in the Nacimiento Water Project (NWP) to bring 2,000 acre-feet per year of supplemental water into the Atascadero Groundwater Basin; the project allows AMWC to offset 40% of its groundwater pumping. Even with the diminished rainfall over the last four years, the NWP has recovered sufficiently each year to provide all the water that the NWP can deliver. This year, AMWC is acquiring an additional 1,000 acre feet from the project to recharge the groundwater in the Atascadero Basin for the benefit of all stakeholders in the basin, not just AMWC shareholders.

We agree that conservation is needed during this prolonged drought. We would like you to consider the above and establish a more reasonable State conservation mandate for AMWC, which we feel would be on the order of a 20% reduction in 2015 compare to 2013.

Respectfully yours,



John B. Neil, PE
General Manager