



## SWEETWATER AUTHORITY

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(3/17-18/15) Board Meeting- Item 7  
Urban Water Emergency Regs  
Deadline: 3/16/15 by 12:00 noon

### GOVERNING BOARD

ERNESTO ZAMUDIO, CHAIR  
TERESA "TERRY" THOMAS, VICE CHAIR  
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JAMES L. SMYTH  
GENERAL MANAGER

JENNIFER H. SABINE  
ASSISTANT GENERAL MANAGER

March 9, 2015

Clerk of the Board  
State Water Resources Control Board  
Office of Research, Planning and Performance



RE: 3/17-18/15 BOARD MEETING (PROPOSED RESOLUTION AMENDING AND READOPTING DROUGHT-RELATED EMERGENCY REGULATIONS FOR URBAN WATER CONSERVATION)

To Whom It May Concern:

The Sweetwater Authority (Authority) wishes to comment on the proposed resolution to amend and readopt drought related emergency regulations (Resolution 2014-0038) for urban water conservation. The Authority has long recognized the need to encourage conservation as a means to discourage water waste and maximize water supply. As a result, the Authority has been actively, and successfully, promoting water conservation to customers since the early 1990's, long before the recent drought. In September 2014, after already reducing consumption within the service area in excess of fifteen (15) percent in five (5) years, through voluntary actions, the Authority amended its Drought Response and Recovery Plan (Plan) to include mandatory water waste prohibitions aligned with water waste prohibitions in Resolution 2014-0038. The Authority also implemented Stage 2 of its Plan. At this level outdoor irrigation restrictions are mandatory.

While the Authority supports the continuation and readopting of drought-related emergency regulations for urban water conservation, we believe the proposed prohibition restricting outdoor irrigation to no more than two days per week puts an undue financial burden on customers. Ultimately this restriction may not achieve the desired results, and could instead result in a significant water rate increase in order to fund enforcement activities.

The Authority recognizes water conservation and demand management as a priority in its comprehensive water use planning, and believes its customers have demonstrated the ability

to conserve water when presented with that goal; and will continue to do so. To this end, in November 2014 the Authority implemented customer Target Water Allocations. The allocations are printed on each bill are based on the historical water usage of each property. Information on past, present and forecasted water use goals provide the customer with a water use history specific to their property, and goal for future efforts. Percent reduction goals are applied to future allocations to meet agency-wide reduction goals. The Authority's Plan includes penalties for exceeding the target water allocation. Target Water Allocations are coupled with an aggressive rate structure.

We request that the water number of days of outdoor irrigation continue to be evaluated and be removed from the proposed update, or modified to allow agencies the opportunity to substitute allocation-based alternative water conservation measures which achieve similar or greater water use reductions.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Sabine".

Jennifer Sabine  
Assistant General Manager