

Jessica,

Overall I think the proposed framework is reasonable.

The one major change I believe is needed is to include the same “sliding” conservation standard used for urban water suppliers within the standards for small water suppliers.

The City of Brisbane operates both a City and Guadalupe Valley Municipal Improvement District water district. These are both small water suppliers, and due to their interconnections we operate them as a combined system to leverage storage.

We read meters bi-monthly – using 2014 Department of Finance population figures, our mid-Aug to mid-Oct 2014 residential consumption was 47 gpcpd. Without the sliding scale, the framework as written would require our consumption be reduced to 35 gpcpd. With the sliding scale we would reduce to 42 gpcpd, which is still lower than 80% of the urban water suppliers as reported in Sept 2014.

I imagine that the current proposal did not consider the efforts that many small suppliers have already made, and I look forward to the Board revising this framework to acknowledge both the conservation efforts made, and the practical impossibility of reducing per capita consumption to less than 40 gpcpd.

Best regards - Randy

Director Randy L. Breault, P.E.

Emergency Services-Marina Services-Public Works

415.508.2131 [Direct] 415.508.2136 [Assistant]

City Hall hours: M-T-Th 8-5, W 8-8, F 8-1