

**DUBLIN
SAN RAMON
SERVICES
DISTRICT**



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December 2, 2015

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th floor
Sacramento, CA 95814



RE: Potential extension and modification of the existing Emergency Regulations for Statewide Urban Water Conservation

Dear SWRCB:

The Dublin San Ramon Services District applauds the Governor's leadership and the collaborative process the State Water Board utilized in 2015 to enact emergency regulations to address the imperiled condition of the State's water supply. DSRSD intends to participate in the workshop that will be held on December 7, and we would like to offer the following comments concerning the proposed extension and modification of the emergency regulations for statewide urban conservation.

We encourage the SWRCB to wait until April or May before imposing any long-term requirements and/or declaring a statewide emergency. Over the past two years our customers "bought in" to the State's drought declaration and slashed their personal water use, even though that meant watching their landscaping wither and die. As a direct result of being willing to "do their part," DSRSD's customers have achieved a remarkable degree of conservation (i.e. about 35% so far this year). Imposing a statewide emergency early in 2016, before water supply conditions are known for specific regions and the state as a whole, will undermine the public's trust in State government and their utility providers. Waiting until April or May to make decisions about imposing new restrictions and conservation goals will demonstrate to the public that their government is indeed responding to a real emergency and acting in their best interest.

If emergency regulations are extended beyond February 2016, DSRSD supports the proposed equity adjustment for agencies that have invested in extensive water recycling systems. Using this proposal, the SWRBC would adjust (reduce) water conservation targets by the proportion of recycled water an agency provides to its customers as a percentage of its total water consumption. This adjustment would recognize the high cost that has been borne by agencies who have already installed these recycling systems.

Finally, the assumption that customers can achieve 25% conservation each and every month of the year is not realistic. During the summer months customers can reduce outdoor irrigation and conserve 40%-

50% or more compared to the same month in 2013. However, during the cooler winter months outdoor irrigation decreases or stops, and it is simply not possible for customers to reduce their indoor water use by 25% compared to the same month in 2013. The media typically picks up on the lower conservation percentages posted during the winter months and reports the results as if conservation is decreasing and water use is increasing, which is inaccurate and misleading. To compensate for the seasonal variation in outdoor water use, water agencies should be allowed a credit for cumulative conservation, similar to cell phone "roll over minutes." Using a 12-month rolling average would be a good way to measure compliance with assigned conservation targets. Under such a system, the SWRBC would no longer use single-month results to report compliance or impose fines.

We will look forward to discussing these topics at the December 7 workshop.

Sincerely,



Dan Gallagher, Operations Manager
Dublin San Ramon Services District

cc: Dave Bolland, ACWA
Fiona Sanchez, Irvine Ranch Water District
John Archer, Interim General Manager, DSRSD
Dan McIntyre, Engineering Services Manager, DSRSD

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