



5005 EL CAMINO REAL • P.O. BOX 6075 • ATASCADERO, CA 93423 • (805) 466-2428

Atascadero Mutual Water Company

ESTABLISHED 1913

November 20, 2015

Ms. Kathy Frevert
Kathy.frevert@waterboards.ca.gov
State Water Resources Control Board
Sacramento, CA



Subject: Extension of Drought Emergency Urban Conservation Regulations

Dear Ms. Frevert:

Please accept the following comments on the extension of the State Water Resources Control Board's (SWRCB) extension of the emergency regulation for urban water conservation.

Atascadero was founded as a self-sustaining, agrarian community. The average lot size in our service area is 1.5 acres, with several thousand lots over 2.5 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. In addition, being inland from the coast, daytime temperatures and the summer can exceed 100 degrees.

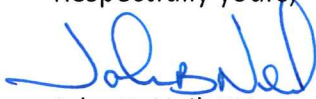
AMWC shareholders recently spent over \$40 million to participate in the Nacimiento Water Project (NWP) to bring 2,000 acre-feet per year of supplemental water into the Atascadero Groundwater Basin; the project allows AMWC to offset 40% of its groundwater pumping. Even with the diminished rainfall over 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. AMWC participated in this project to ensure adequate water supplies for its shareholders in times of drought.

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.

Even before the State imposed conservation standards on urban areas, the AMWC Board adopted a resolution declaring a water shortage condition due to the persistent drought condition, with a use reduction goal of 15 - 35%.

We agree that conservation is needed during this prolonged drought. We would like you to consider establishing more reasonable conservation standards for communities like Atascadero, which we feel would be on the order of a 20% reduction versus the 28% State-imposed reduction standard.

Respectfully yours,



John B. Neil, PE
General Manager