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Felicia Marcus, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95818
Sent Via Email: Jessica.Bean@waterboards.ca.gov

SUBJECT: Comment Letter Regarding Mandatory Restrictions to Achieve a 25% Statewide Reduction in Potable Urban Water Use

Dear Ms. Marcus:

The Goleta Water District (District) appreciates the opportunity to comment on the latest draft regulations promulgated by the State Water Resources Control Board (SWRCB), and believes the measures contained in the latest draft are prudent, necessary measures for preservation of California's water supply to meet public health and safety needs.

The District's customers have historically and continue to be among the top communities in water conservation, as demonstrated by the District's per capita usage patterns. Coming out of the 1987-1992 drought, the District was a leader in water conservation and rebate programs. Under the current unprecedented drought, we continue to implement a range of incentive-based programs, including issuing over 200 rebates for landscape and turf replacement, implementing a Water Saving Incentive Program for rebates to commercial and landscape irrigation accounts, promulgating a customized water budget and survey program, and continuing a decade old water saving device distribution program.

The District declared a Stage II Water Shortage on September 9, 2014, and has been actively enforcing mandatory water use restrictions with a system-wide reduction goal of 25%, in full compliance with Governor Brown's prior mandatory measures. Demand reductions have fallen short of that 25% target thus far. As a result of the lack of appreciable rainfall and the need to continue driving demand downward, the District is positioned to declare a Stage III Water Shortage Emergency in May. Additional tightening of ongoing mandatory water use restrictions coupled with the planned imposition of drought surcharges for all customers and extensive public outreach and conservation incentive program implementation are designed to achieve the District's 35% Stage III demand reduction target. As the drought remains unabated, it is critical for our District and agencies across California to protect the remaining water supplies necessary to preserve public health and safety.

April 22, 2015

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The District is pleased that the "baseline" for determining tiers was revised to move away from using a single month (September 2014) per capita usage to determine water savings targets. Further, we recognize that our target, as set by the SWRCB, is reasonable and achievable. The District also appreciates the SWRCB's recognition that many water agencies such as the District have a high amount of agricultural use. However, the District suggests that a more equitable system for setting conservation targets would be to set state-wide gallons per capita per day targets that all agencies must meet. Such a proposal would require all residents to reduce to a reasonable per capita amount set by the SWRCB. This type of structure would prevent inequities of communities with already very low per capita water use from having to reduce beyond their practical means.

Over the summer and into the fall, the District pledges to do our part to seek even further reduction targets from our customers to conserve as much local supply as we can and remains supportive of Governor Brown and the SWRCB's efforts to support California water agencies' water conservation efforts in this time of emergency.

Sincerely,

A handwritten signature in blue ink, appearing to read 'John McInnes', with a long horizontal flourish extending to the right.

John McInnes
General Manager