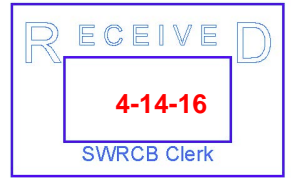




City of Buellton



April 13, 2016

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

Re: COMMENT LETTER – URBAN WATER CONSERVATION WORKSHOP

Dear Ms. Townsend:

Thank you for the opportunity to provide input on potential adjustments to the February 2016 Emergency Regulation. These regulations do not address adjustments for small, non-urban communities. When contacting the State Water Board, As a small municipality that provides water supply to its residents and businesses, we are particularly sensitive to the statewide drought issues and have particular interest in finding long-term sustainable options for our water supply.

With only 1600 service connections, we fall under the Small Water Supplier classification. However, similarly to the Urban Water Users, not all small systems are equal. In fact, our situations can more vastly vary due to our rural nature. The target of these drought regulations aim towards water waste that is typically found from outdoor irrigation, which is primarily residential areas. In our small community, residential use makes up approximately 50% of our water use. The rest is commercial/industrial use. The commercial/industrial use has minimal to no outdoor irrigation. While have reduced water consumption overall, it is challenging and difficult to have an overall compliance reduction of 25%. The target users for outdoor irrigation – our residential sector has already reduced 30% - which is significant. However, continued reduction for commercial/industrial will result in businesses failing and closing, creating a devastating economic impact to our small community. Any consultation with the State has just generally pointed at the 25% or restrict water use to 2xs a week. In review of the Urban Water Users' adjustment calculations – there is some discussion regarding smart growth credits – but this too is limited to residential and capita growth. We have growth in both residential and commercial/industrial. There isn't a method to account for the commercial/industrial growth. There needs to be realistic assessment and allowed adjustment for small communities. Otherwise this is a fatal flaw in the emergency regulations that may punish and bankrupt the small communities such as ours.

Thank you for your assistance. If you need any additional information, you may contact me at (805) 688-5177 or via email at roseh@cityofbuellton.com.

Sincerely,

Rose Hess

Rose Hess, PE
Director of Public Works
City of Buellton