

City of Foster City

ESTERO MUNICIPAL IMPROVEMENT DISTRICT

610 FOSTER CITY BOULEVARD
FOSTER CITY, CA 94404-2222



July 14, 2014

Via Electronic and U.S. Mail

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95814-0100
commentletters@waterboards.ca.gov

**Subject: COMMENTS REGARDING CONSIDERATION OF A PROPOSED RESOLUTION
FOR DROUGHT-RELATED EMERGENCY REGULATIONS PERTAINING TO
URBAN WATER CONSERVATION**

Dear Ms. Townsend:

The Estero Municipal Improvement District (EMID), urban water supplier to the cities of Foster City and a portion of San Mateo, submits the following comments on Agenda Item 10 on the State Water Resource Control Board's July 15-16, 2014 Agenda, regarding "Consideration of a proposed Resolution for drought-related Emergency Regulations pertaining to urban water conservation."

EMID began implementing tiered water rates during fiscal year (FY) 2010-11. Due to the implementation of these rates and an effort to meter large outdoor water users separately we have seen water use reduced approximately 20% since 2009. During this time EMID's gallons per capita per day (gpcd) has decreased from the baseline reported to the state in 2010 of 161 gpcd to approximately 113 gpcd for FY 2013-14. This represents nearly 30% reduction in gpcd and is already below our target of 139 gpcd established for 2020. As you can see EMID takes water conservation seriously and will continue our efforts.

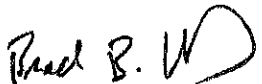
We support the State Water Board's efforts to reduce urban water use and have been promoting the San Francisco Public Utilities Commission's (SFPUC) voluntary 10% reduction since February of this year. Therefore, many of the "Prohibited Activities in Promotion of Water Conservation" are being promoted to the District's customers.

Should the State Water Board proceed with the proposed resolution we urge you to consider an implementation date that would allow our District time to address our Board for approval to implement a water shortage contingency plan (WSCP). The meetings to take such action legally require specific public notification procedures and periods that may be in conflict with the State Water Board's timeframe for the mandated WSCP implementation. We are opposed to a penalty of \$10,000 per day for not implementing the WSCP within the State Water Board specified timeframe, due to other legal constraints beyond our control.

We encourage the State Water Board to evaluate the recent water reduction efforts made by EMID as it reviews the monthly monitoring reports provided by the various urban water suppliers and evaluates the results of the water use restrictions. With the efforts already being made by our customers, additional efforts could be difficult for some.

We thank the Board for the opportunity to provide these comments and for leading the efforts in water conservation.

Very truly yours,


Brad B. Underwood
Director of Public Works

cc: President and Members of the EMID Board of Directors
James C. Hardy, District Manager
Jean B. Savaree, District Legal Counsel