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April 22, 2015

Ms. Jessica Bean
 State Water Resources Control Board
 PO Box 100
 Sacramento, CA 95812-0100

Subject: Comments on Draft Regulations Implementing 25% Conservation Standards

Dear Ms. Bean:

The Contra Costa Water District (CCWD) appreciates the opportunity to provide comments on the Draft Regulations Implementing 25% Conservation Standards (Draft Regulations), dated April 18, 2015. CCWD provides retail and wholesale water service to approximately 500,000 residents in Central and Eastern Contra Costa County. During the last 20 years, CCWD and its ratepayers have invested nearly a billion dollars locally in water supply, water quality and water conveyance improvements. CCWD provides the following comments on the draft regulations developed by the State Water Resources Control Board (SWRCB).

Reduction Tiers

The number of tiers presented in the Draft Regulations has more than doubled from the proposed regulatory framework, presumably with the intention to more equitably allocate the conservation necessary to meet the savings goals. The tier structure presented in the Draft Regulations is overly precise and provides opportunities for confusion with the public. CCWD recommends streamlining the number of tiers down to six tiers that are in 5% increments. A streamlined tier structure can still achieve an equitable allocation of the required savings and is more intelligible to the public. Whatever final tier structure is adopted by the SWRCB, water agencies that have average or below average per capita water use should be placed in a tier no greater than the overall statewide 25% reduction target. A suggested tier structure is shown in the following table.

Table: Recommended Conservation Standard Tiers

Tier	R-GPCD (JUL-SEP)		Approx. Suppliers	Conservation Standard
	From	To		
1	0	69.99	23	10%
2	70	89.99	35	15%
3	90	114.99	53	20%
4	115	164.99	132	25%
5	165	214.99	76	30%
6	215	612	92	35%

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State Water Resources Control Board
April 22, 2015
Page 2

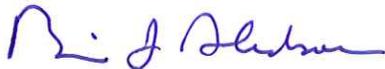
Water Agency Drought Program Implementation

There is a significant amount of time required for water agencies to implement drought program requirements within their service areas, including Proposition 218 notices, multiple readings of ordinances, and public hearings. The SWRCB should acknowledge this in its development of regulations and consideration of changes. Many agencies, including CCWD, have moved forward with implementation of drought programs based on the SWRCB's Proposed Regulatory Framework dated April 7, and prior to the release of the April 18 Draft Regulations. This was done to ensure a drought program would be in effect and enforceable during the summer months, when usage of water is at its peak. CCWD requests the SWRCB consider adding the following language to the regulations allowing a supplier to implement a drought program consistent with the April 7 Regulatory Framework, if such a program was adopted prior to the release of the April 18 Draft Regulations.

An urban water supplier that adopted a drought management program prior to April 18, 2015 that includes a reduction in total water usage consistent with the April 7 Proposed Regulatory Framework shall have the ability to use the conservation standard identified in the April 7 Proposed Regulatory Framework.

CCWD appreciates the SWRCB's consideration of these comments. If you have any questions please call me at (925) 688-8300

Sincerely



Brice J. Bledsoe
Assistant General Manager, Administration

BJB/kc