



December 16, 2014

Ms. Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814

Dear Ms. Townsend,

Please accept my comments regarding public input to the board:

1. **What more should be done at the local and/or State level in the near-term to increase water conservation?** It would be helpful if the state could further fund the Save Our Water Campaign for continued statewide public outreach and to also assist local agencies with competitive funding opportunities to conduct their own outreach campaigns.
2. **What additional conservation requirements, if any, should the State Water Board consider adopting if dry conditions persist into the new year?** Each area of the state has different conditions so it is difficult to recommend a one size fits all approach. If there are additional mandatory restrictions, it is better that they are more general goals that allow for agencies to strategize on how they can best meet those goals. Or, that they are tied to an agency's own strategizes planned for in their specific drought stages. This may be tied to an agency's Urban Water Management Plan.
3. **What can be done to compel poorer performing areas to increase conservation?** It may not be clear what is a "poorer" performing area.
 - Some agencies may not have saved 20% because they have already implemented significant reductions.
 - Other agencies may have a large number of smaller farms that are classified as residential accounts because they do not comply with agriculture requirements, which makes it appear that average residential usage is very high.
 - Or, other agencies have a disproportionate number of larger residential properties that skew gallons per capita day numbers. It would seem unfair to target highly suburbanized communities more than highly urbanized communities or inland communities more than coastal communities.
 - Some agencies have limited their demands considerably below their safe yields through reductions in agriculture or resale water sales so urban demand may provide only a limited view on their overall performance in reducing water demand.
4. **What additional data should the Water Board be collecting and how would it be used?** Local agencies already collect and report a considerable amount of data so if at all possible it would be preferable not to further increase local agency reporting requirements unless the additional data can be used to relieve an agency of any inappropriate restrictions or regulations that do not further long term water sustainability goals.

Sincerely,

Ron Merckling
Public Affairs/Resource Manager