



## San Diego County Water Authority

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March 12, 2015



Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
Post Office Box 100  
Sacramento, CA 95812-2000

#### MEMBER AGENCIES

Carlsbad  
Municipal Water District  
City of Del Mar  
City of Escandido  
City of National City  
City of Oceanside  
City of Poway  
City of San Diego  
Fallbrook  
Public Utility District  
Helix Water District  
Olivenhain  
Municipal Water District  
Otay Water District  
Padre Dam  
Municipal Water District  
Camp Pendleton  
Marine Corps Base  
Rainbow  
Municipal Water District  
Ramona  
Municipal Water District  
Rincon del Diablo  
Municipal Water District  
San Dieguito Water District  
Santa Fe Irrigation District  
South Bay Irrigation District  
Vallecitos Water District  
Valley Center  
Municipal Water District  
Vista Irrigation District  
Yuma  
Municipal Water District  
OTHER  
REPRESENTATIVE  
County of San Diego

**Subject: 3/17–18/2015 Board Meeting: Consideration of Proposed Resolution Amending and Readopting Drought-Related Emergency Regulations for Urban Water Conservation**

Dear Ms. Townsend:

The San Diego County Water Authority (Water Authority) strongly supports the efforts of the State Water Resources Control Board (State Water Board) to respond to the severe statewide drought conditions and preserve remaining supplies as California enters its fourth consecutive dry-year. We also appreciate the opportunity to submit comments regarding Agenda Item 7, "Consideration of a proposed Resolution amending and readopting drought-related emergency regulations for urban water conservation."

The Water Authority supports adoption of the Resolution extending the regulations in order to maintain and achieve additional conservation savings statewide. The proposed additional statewide prohibitions and urban water agency requirements are a reasonable next step given the worsening situation and are consistent with our regional Drought Response Model Ordinance and with measures taken in San Diego County by retail water agencies. With input from our retail member agencies, we've developed the following remarks regarding the proposed regulations and implementation of the requirements. We have also included additional comments regarding reporting data and statewide effort on public messaging.

In a general comment, we have heard concern from some over the limit on days of the week watering. With the State Water Board's focus on measuring reductions in gallons per capita day consumption (gpcd), some consideration should be given to those relatively few urban agencies with very low gpcd rates which may be the functional equivalent of limited watering days from the perspective of promoting efficiency. Those agencies may encompass economically disadvantaged communities where increased enforcement costs may prove more of a burden for ratepayers.

### **Monthly Reporting on Water Conservation Compliance and Enforcement Efforts**

The Water Authority supports adding this reporting requirement, but because each urban water agency may take a different approach to ensuring customers comply with the

restrictions, we would request that the monthly reporting be done in an open field. Over the course of many years in working with their customers, urban water suppliers have found that, even during restrictions enforcement, activities require a certain amount of flexibility and understanding of what will be the most effective approach within their region. This response could range from customer education, notice of violations or other measures that not only result in immediate water savings but contribute to long term behavioral changes once the drought is over. With an open field, respondents can identify the specific mechanisms that are effective within their communities to ensure compliance with the mandatory measures.

#### **Prohibit Application of Potable Water to Outdoor Landscapes During and up to 48 hours after Measurable Rainfall**

The Water Authority fully supports the intent of this conservation measure. This winter we had a specific regional public outreach campaign aimed at eliminating outdoor water use during rain events. It was a continuation and intensification of a strategy we have employed for several years in working with local media to get residents and business to shut their systems off during the rainy season. We believe the outreach campaign had a positive effect in helping reduce water waste during this current winter, which was reflected in our December and January water use. Although an important outreach message for the public, making it a regulation subject to enforcement may prove difficult and problematic. Defining what is a substantial amount of rainfall, where that measurement takes place and when action needs to be taken by the irrigator makes uniform application of such a regulation very complex. For example, in situations where rains have not been forecasted, there is not adequate time for municipalities with a large number of irrigation meters citywide, to respond to an immediate need to shut their systems down. This could be true also for commercial sites managed by landscape contractors that have to get to multiple sites during the rains and may be overwhelmed by the sheer number of meters to be turned off. Any agency's ability to direct resources, on a very short notice, to engage in meaningful enforcement would be equally difficult and costly. Although the Water Authority does support the concept and has prioritized it as part of our public outreach campaign we believe that a regulatory mandate should be deferred while more of the details and the manner of implementation are discussed with water suppliers. Given that this year's limited rainy season is virtually completed there seems to be time for the State Water Board to continue to refine this concept and make any modifications well before the next rainy season begins.

#### **Extend Implementation Timeline**

Water suppliers adopt changes to their water shortage contingency plans by resolution or ordinance through a process that requires notice and public hearing by the Board of Directors or City Council. This action generally cannot be completed within 30 days as proposed in the emergency regulation. The Water Authority recommends that water suppliers be afforded 60 days to allow sufficient time to adopt the necessary changes to their water shortage contingency plans to potentially add additional restrictions consistent with the proposed updated regulations. This additional time will allow for implementation measures to be in place before the peak irrigation season begins.

**Including Voluntary Submittal of 2007 Water Use as Benchmark**

The Water Authority asks the State Water Board to consider collecting 2007 water use data as a benchmark for both 2014 and 2015 monthly production data. Because 2007 was the last “average” water year before the economic downturn, it provides a good baseline by which to judge past conservation efforts that could influence urban agencies ability to immediately achieve large volumes of water savings. We appreciate that the State Water Board has recognized the efforts of urban southern California in achieving significant savings over a long period of time through aggressive water conservation. For many urban water agencies throughout California, water use in 2007 has significant value in determining how much savings we have achieved and where additional immediate savings can be obtained. It is also important to recognize the public’s achievement and commitment to water use efficiency which is clearly demonstrated when compared to that benchmark. Including the monthly 2007 water use data could be optional for the water agencies, but where submitted could provide the State Water Board, public and media with valuable information in understanding other factors that could be influencing water conservation efforts.

**Expand consistent statewide public messaging on conservation**

Consistent, continued messaging at the state level is key to driving home a new set of expectations for public conservation behavior. The Water Authority asks that the state fund and implement an expanded statewide outreach campaign. Coordinating the campaign across state agencies and with regional and local partners to provide consistent messaging to the public is critical to create a new statewide ethic of conservation and achieve the immediate reductions in water use that are required during this extraordinary drought event. The state could leverage successful large-scale outreach campaign examples from places such as Australia and/or build on effective local programs.

We appreciate the opportunity to comment on the proposed Resolution and support the State Water Board’s efforts to help manage the state’s response to the current drought conditions. Please contact Dana Frieauff, Water Resources Manager at (858) 522-6749 if you have any questions or would like further details regarding the Water Authority’s comments.

Sincerely,



Ken Weinberg  
Director of Water Resources