



April 22, 2015

Jessica Bean at Jessica.Bean@waterboards.ca.gov

Re: Comments on regulatory approach and draft emergency regulations to achieve 25% water conservation

The Hi-Desert Water District provides water to the Town of Yucca Valley and Yucca Mesa. We have been a leader in water conservation in our part of the state as evidenced by our 85.2 GPCD usage in 2014. We have considered the issue of water conservation and do not believe establishing percentage reductions for each urban water supplier is the right strategy. Setting a percentage reduction goal, even one of 36%, does not make water wasters efficient – it just makes them less inefficient. This is clearly demonstrated by looking at the GPCD rates in your tiered worksheet for adjacent water districts.

Urban water suppliers are required by law to prepare Urban Water Management Plans and update them every 5 years. These plans must include steps we would take to address drought but all of this work, costing millions of dollars in capital projects meant to address these issues, is being ignored. Based upon this planning, we know the big water savings comes in the form of replacing failing steel water mains thereby alleviating the District of hundreds of leaks per year.

We believe a better strategy is to target the heavy water users/wasters by setting two GDCPs: for indoor use and one for outdoor use or “residential, non irrigation purposes” and “residential irrigation”. A statewide goal for GPCD for residential non irrigation would be unaffected by such factors as urban density, climate, etc. For GPCD for residential irrigation, regional goals could be set based on climate, so that all water suppliers in the area are working toward achieving the same level of water efficiency. This approach would not penalize communities, such as Yucca Valley, that have already removed almost all residential turf, and have been aggressively conserving water for over 20 years, and focus attention on communities that have not been so active.

Most of the SWRCB’s specific conservation actions in the draft emergency regulations were adopted years ago by HDWD:

1. 90% all homes in Yucca Valley have been retrofitted with low flow toilets due to our retrofit program implemented in 1990. Toilets, before we started this program, used up to 7 gallons per flush, now the retrofitted toilets use 1.6 gallons or lower per flush. This equates to a water savings of 5.4 gallons per flush.
2. CIMIS (California Irrigation Management Information System), which was implemented in the 1990’s limits the amount of water usage on grass fields for sports. The incentive is



that they get a better rate than a tiered rate. It also prevents the sports fields from being over watered because it's based on evaporation rates.

3. The District adopted restrictive water use regulations in 1992, which parallel the restrictions included in the proposed SWRCB draft regulations to become effective in June, 2015.
4. Since 1997, the District has operated a Capital Replacement Project to replace old leaking steel water mains with new PVC pipes. There is a charge on the monthly water bill (CRP fee) which funds this ongoing project. To date, over 530,000 feet of old steel water mains have been replaced, saving water lost to leaks.
5. We have one of the highest tiered water rates in the State. For example, the Desert Water Agency, one of the neighboring water suppliers, has a water rate of \$1.57 for 100 cubic feet of water whereas HDWD starts at \$3.59 to \$9.00/100 cubic feet depending on the tier. We do not yet know what impact the recent court ruling regarding tiered rates will have on our District.
6. HDWD installed electronic read meters to identify high water use and notify customers of unusual water usage, which may be due to a possible leak. Given our high water rates, our customers are very motivated to conserve and we perform frequent water audits for customers to identify any leaks.
7. Residential landscape in Yucca Valley is almost exclusively xeriscape or natural desert landscaping, utilizing drip systems for irrigation. The majority of the grass in Yucca Valley is owned by the Town and the School District and are public spaces. Due to our desert climate, the residents have opted for green public space in lieu of private lawns.
8. Approximately 80% of the residents do not have air conditioning and rely on evaporative cooling systems (swamp coolers) to combat our high summer temperatures. Electricity rates are too high for these residents to afford air conditioning. In our hot climate, being able to use swamp coolers becomes a health and safety issue.

In summary, we urge the Board to abandon the percentage approach and instead establish a statewide goal for indoor water consumption and regional goals for residential landscaping, thereby focusing greater effort on the communities with the most inefficient programs.

Sincerely,



Ed Muzik
General Manager

