

May 3rd 2015



Attn: Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Dear Water Resources Control Board:

First of all, I commend Governor Brown for issuing the 25% mandate, requiring water use reductions is not an easy stance to take, but it needed done.

I am also cognizant of the challenges the WRCB has in implementing the Governors mandate, there are lots of stakeholders and many with opposing objectives.

When it comes to water conservation, there has been an unrelenting push to reduce usage in the same areas; outdoor irrigation, low flow fixtures and low flow toilets. All of that is great, especially if you live in a single family home and have your own water meter, but that's not the case for a large portion of the households in California. With an unprecedented drought, perhaps it's time to start looking at areas of conservation that haven't already been beaten to death for many years.

No one at the State level appears to understand that there is a huge percentage of the population in California (~35%) that is not water metered. This means they don't know how much water they use and cannot measure how much they conserve! These are people who live in multifamily buildings of condominiums, townhomes and apartment complexes that are 'master metered' (meaning there is only a single water meter per complex or building).

In many cases these individual dwelling units can be sub-metered, with sub-metering the residents can; 1) pay for their own water usage, and 2) track how much water they use/conserve. Without being sub-metered, the people using the water are completely disconnected, they have no way of knowing their usage and they do not see a water bill!! (If they do pay for water it is not based on usage).

This group of water consumers in our state, represents a huge percentage of potable water consumption, but they (nor anyone else) knows how much they use! To further add to the problem, many of these complexes still share irrigation lines with household usage, so even the 'master meter' usage does not allow the property manager or HOA board to accurately determine where their water is going (You Can't Conserve What You Can't Measure!)

When water sub-meters are retroactively installed in a multifamily complex, water usage drops by 18-36% over the following 3-4 months and even more over time, this initial drop in usage is largely due to leak discovery. Once sub-meters are installed suddenly you can see where the water is going, which units have constant flow or abnormally high usage, and since the residents are now paying for their own usage, they have incentive to find and fix these leaks (almost always running toilets).

The majority of this is WASTED water, not water used for any purpose at all, just water running unnecessarily through a faulty toilet. This is not water to keep grass green, trees alive, wash a car, grow a crop..... NOTHING, just pure waste, but without it being metered it is unknown.

These are not hypothetical statistics, I have been installing water sub-meters in townhome and condo communities for years and we have done many case studies that show these numbers repeatedly. This is why the City of San Diego has mandated sub-metering on all new construction and EBMUD and SCVWD both offer rebates for retrofit installation of water sub-meters.

Why nothing from the state level? Most HOA boards want to sub-meter, but many cant due to archaic CCR restrictions, if the State simply said 'Any multi-unit residential complex that can feasibly be sub-metered, must do so' there would be hundreds of thousands of households that are not currently metered, getting meters and saving water this year.

This dually frustrates me personally because I live in the Fallbrook Public Utility District, which has been handed a 36% mandatory reduction, so we have to cut our usage very substantially, while I know for a fact that there are tens of thousands of people with effectively un-metered water that have running toilets wasting water. It just doesn't make sense.

Sometimes if you walk around the apple tree and get a different perspective, you can find more 'low hanging fruit'.

Sincerely,

Moquey K. Marquross