

Comment Emergency Water Conservation Regulation



To: Jeanine Townsend, Clerk to the Board State
Water Resources Control Board
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Re: Emergency Water Conservation Regulation

Totalizer meters at water source now necessary.

Many community water suppliers don't have meters at their source. The SWRCB, therefore, has no way to validate if a supplier's water use, conservation savings and diversion reporting is accurate. This is a concern in my community where the use data and diversion and conservation reports appear to be manipulated to show water savings that have not taken place.

Cheating in this way has historically been such a prevalent practice in human affairs that there is a folk term for the practice, "The fox watching the hen house door." This problem seriously undermines the effectiveness of the Emergency Conservation Regulation. The SWRCB must take human nature into account if it is to be fully effective with its actions.

This foxy "no meter" practice will provide attractive water savings reports but it seriously compromises the effectiveness of the SWRCB's important initiative to reduce water use during this ongoing drought.

Solution: The WRCB must immediately require all water suppliers to install a water totalizer meter at its water source(s). The totalizer meter should contain sufficient recording digits to ensure that "roll over" to zero does not occur between reporting periods. The meter needs to be of a type that can't be reset or zeroed out. The accumulated total on the meter must be reported on all SWRCB reports, which ask for volumetric amounts.

This solution will reduce data manipulation considerably and will allow the SWRCB to have more accurate conservation water reporting and more accurate data regarding water loss in water supplier's systems.