



## San Diego County Water Authority

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September 15, 2016

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#### OTHER REPRESENTATIVE

County of San Diego

**Mr. Peter Brostrom**  
Department of Water Resources  
Water Use and Efficiency Branch  
P.O. Box 942836  
Sacramento, CA 94236-0001

**Subject:** Comment Letter – Framework for Setting Water Use Targets Based on Indoor Water Use, Outdoor Water Use, Commercial, Industrial, and Institutional Water Use, and System Water Loss

**Dear Mr. Brostrom:**

The San Diego County Water Authority (Water Authority) appreciates the opportunity to provide comments on the development of the framework for setting water use targets based on indoor water use standards, outdoor water use standards, commercial, industrial and institutional water use standards, and system water loss standards related to Directive #2 of the Governor's Executive Order B-37-16. Between 1990 and 2015 per capita potable water use in the San Diego region dropped by nearly 40 percent, meaning the region does more today with less water than the region used in 1990. The water savings were the result of aggressive water use efficiency programs, legislation, and outreach programs. During the state's emergency conservation mandates to reduce water use from June 2015 through May 2016, regional water use declined by 22 percent compared to the state's baseline in 2013, beating the state targets. And in June 2016 – the first month following the end of state water-use reduction mandates – water use was down 23 percent compared to June 2013.

In order to develop a permanent framework that supports the state's goals for long-term water use efficiency as outlined in the Governor's executive order, the Water Authority recommends an iterative process that allows sufficient time to test the proposed standards for each of the sector budgets and to make refinements as necessary. The long-term water use efficiency framework should provide a broad policy outline on the approach to calculating the new water use targets. The state should then allow sufficient time to pilot test the proposed target-setting methodology with water suppliers and incorporate needed refinements. In addition, any actions taken by the state should distinguish between long-term water use efficiency and short-term, emergency water use reductions. Long-term water use efficiency is an important component of comprehensive water management and one element of a diverse portfolio of sustainable water supplies.

*A public agency providing a safe and reliable water supply to the San Diego region*

In response to the proposals presented on September 6, 2016, in Oakland, and on September 8, 2016, in Los Angeles, the Water Authority offers the following comments and recommendations.

#### Indoor Residential Water Use Sector Budget

- The Water Authority supports the proposed initial indoor water use standard of 55 gallons per capita per day in 2021.
- Reevaluation of the indoor residential water use standard beginning in 2025 should be scientifically-based and consider the projected impact of plumbing codes and appliance standards on the indoor residential water use standard.
- The Water Authority recommends that a minimum indoor residential water use standard be established to ensure wastewater flows are sufficient for proper operation of wastewater systems.
- The Water Authority recommends that variances are provided to water suppliers to account for special conditions related to indoor water uses (e.g. the use of medical devices, evaporative coolers, etc.).

#### Outdoor Landscape Water Use Sector Budget

- The Water Authority recommends the use of irrigable area to calculate the outdoor landscape water use standard. Currently, the area of irrigated landscape in the state is less than the area of irrigable landscape as a result of voluntary and mandatory outdoor landscape water use restrictions. The use of irrigable area accounts for landscape areas that will be irrigated in the future when drought conditions change or new, low-water use landscapes are installed. In addition, the use of irrigable area eliminates the need for annual updates to the aerial imaging that would be required to identify changes in irrigated area. Updated aerial imaging of a water supplier's irrigable area should be provided by the state every five years.
- To simplify the calculation of the outdoor landscape water use budget, the Water Authority recommends using an evapotranspiration adjustment factor (ETAF) of 0.8 for all homes built through 2015. Homes built after 2015 would be subject to the ETAF in effect at the time of the construction of the home. Special Landscape Areas would continue to have an ETAF of 1.0. Simplification of the calculation is essential to reduce the significant amount of staff time that will be required to verify the data.
- The Water Authority does not support future reevaluations of the outdoor landscape water use standard for homes built through 2015.
- The Water Authority recommends that variances are provided to water suppliers to account for special outdoor water uses (e.g. livestock, environmental mitigation, etc.).
- The Water Authority supports including the irrigable area of CII customers in a water supplier's outdoor landscape water use target.
- The Water Authority supports the exclusion of recycled water, potable reuse, and desalinated water production from a water supplier's total water use when determining compliance.
- The Water Authority recommends that the framework contain an option for agencies to exclude agricultural water use from the outdoor landscape budget.

Mr. Peter Brostrom  
Page 3  
September 15, 2016

- The Water Authority recommends that the state take into account the additional water supplier resources necessary to implement the proposed methodology and provide financial assistance.

#### Commercial, Industrial, and Institutional Water Use Sector Budget

- The Water Authority supports the inclusion of the irrigable area of CII customers in a water supplier's outdoor landscape water use target.
- The Water Authority supports the development of best management practices for process water users. Establishment of a volumetric reduction target or water use efficiency target for CII process water is not feasible since CII process water use is unique to each water user and industry. Instead, the state should work with the CII sector to develop best management practices that increase water use efficiency without impacting production, output levels, or employment.
- The Water Authority recommends that variances are provided to water suppliers to account for an increase in CII water use as a result of economic growth in the CII sector.
- The Water Authority supports a reevaluation of the CII water use standard every five years, beginning in 2025.

#### System Water Loss Sector Budget

- The Water Authority supports the use of the SB 555 process to establish system water loss standards.
- The Water Authority supports the year 2025 as the first year for water suppliers to achieve their system water loss standard.
- The Water Authority supports a reevaluation of the system water loss standard every five years, beginning in 2025.

We hope our comments and recommendations are helpful. In the meantime, we continue to take action on many levels to promote long-term water use efficiency. Please contact Jeff Stephenson at 858-522-6750, or [jstephenson@sdewa.org](mailto:jstephenson@sdewa.org), with any questions or for additional information related to the Water Authority's comments and recommendations.

Sincerely,



Maureen A. Stapleton,  
General Manager