



ALAMEDA COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, ZONE 7

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July 14, 2014



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95814-0100

(Transmitted via email to commentletters@waterboards.ca.gov)

Subject: ***Comment Letter— July 15, 2014 Board Meeting - Item 10: Emergency Water Conservation Regulations***

Dear Ms. Townsend:

Zone 7 Water Agency (Zone 7) appreciates the opportunity to comment on the proposed emergency rulemaking related to 'Prohibition of Activities and Mandatory Actions During Drought Emergency.' Zone 7 has been severely affected by the drought conditions in California and commends the State Water Resources Control Board (SWRCB) for taking action, particularly in preparation for another dry year in 2015. We especially support the SWRCB's recognition of water utilities' ability to manage drought conditions through the implementation of Water Shortage Contingency Plans, which have been developed to respond to each utility's unique local conditions.

Zone 7 is the wholesale urban water supplier to businesses and approximately 220,000 residents in the cities of Livermore, Pleasanton, Dublin and the Dougherty Valley portion of San Ramon. Over 80 percent of Zone 7's supply comes from the State Water Project (SWP) and conveyed through the Delta to reach the Livermore-Amador Valley. This year, Zone 7 is only receiving five percent of its Table A contractual amount from the SWP, with the majority only available starting in September. Other regional demands for water are normally met by a combination of local runoff captured in Lake Del Valle, conjunctive use of the local groundwater basin and regional use of recycled water. Local dry conditions, with precipitation at 46% of average, have resulted in minimal local water supply for Zone 7, resulting in heavy reliance on our local groundwater basin to make it through the peak demands in the summer (SWP water banked locally during previous wet years). Recycled water is also playing an important role in meeting local irrigation demands.

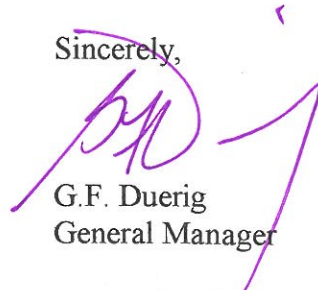
While Zone 7 has had a successful conservation program in place for many years, given the extreme drought conditions, the Zone 7 Board of Directors set forth water demand reduction measures needed to achieve an overall 25% cutback in treated and untreated water deliveries for 2014. In January, the Zone 7 Board declared a local state of drought emergency and in April, the Zone 7 Board directed its retail water agencies to achieve conservation consistent with "Stage 2 Actions" under Zone 7's Water Shortage Contingency Plan, which was set at an overall 25%

reduction. Because the majority of water used for non-public health and safety is used outdoors in our service area, Zone 7 specifically targeted mandatory reductions in outdoor irrigation, with prohibitions designed to reduce outdoor demands by at least half (copy of April 16th letter sent to Zone 7's retail water agencies attached).

Zone 7's retailers and their customers are responding to the calls for conservation. From January through June 2014, cumulative treated water demands from Zone 7 have been 23% lower than the same months in 2013. A large reduction in demand in June has contributed to significant progress towards the 25% target for the year: June 2014 was 43% lower than June 2013, a difference of 685 AF or 23 MGD (graphs attached).

In summary, our local efforts to achieve 25% conservation through the imposition of mandatory reduction actions focused on reducing outdoor watering with potable water have been successful. We would like to continue to work with the SWRCB to ensure that California responds to these emergency conditions in the most thoughtful and efficient ways possible without hampering local efforts that may already be successful or unnecessarily confusing the public. As such, Zone 7 is prepared to provide water production data as shown above; however, per capita water use [Section X.2.(d) of the proposed regulations] is nearly impossible for a wholesale water agency to provide, especially since many retail water agencies have their own local supplies. Therefore, any request for per capita consumption information would be best directed at the retail level, where full end-use water consumption is captured.

Sincerely,



G.F. Duerig
General Manager

Attachments – April 16th letter to Zone 7's retail water agency; graphs of 2014 drought conservation achieved to date



April 16, 2014

Bert Michalczyk, General Manager
Dublin San Ramon Services District
7051 Dublin Boulevard
Dublin, CA 94568

Daniel McIntyre, Public Works Director
City of Livermore
1052 S. Livermore Ave.
Livermore, CA 94550

Daniel Smith, Director of Operation Services
City of Pleasanton
3333 Busch Road
Pleasanton, CA 94566

Frank Vallejo, District Manager
California Water Service Co.
195 S N Street
Livermore, CA 94550

Subject: **25% Water Shortage – Stage 2 Actions**

Zone 7's Board of Directors received the Annual Review of Sustainable Water Supply at this evening's Regular Board Meeting. Due to the unprecedented and extreme drought conditions, the Zone 7 Board declared a local state of drought emergency on January 29, 2014. On January 31, 2014, the California Department of Water Resources (DWR) reduced the State Water Project's 2014 Table A allocation to 0% for the first time in the history of the Project. This evening, taking these changed conditions into consideration, the Zone 7 Board directed staff and the retailers to achieve the necessary 25% conservation following Zone 7's Stage 2 Action Plan (attached). Note that, based on conditions that have changed since December 2013, this letter supersedes any previous letter sent by Zone 7 related to water availability in 2014.

Under Water Service Provision 5(c) of Zone 7's Contracts and "Terms and Conditions," Zone 7 hereby notifies each of you that Zone 7 is unable to provide 25% of your projected demands for Calendar Year 2014 and will only be able to provide 75% of the treated water necessary to satisfy your requirements this year. The attached Action Plan is an outline of minimum actions required to reduce demands by 25%. If additional actions are needed in your individual service areas to assure a 25% demand reduction, it is imperative that you implement such program actions as soon as possible. In addition, Provision 5(c) permits retailers to seek alternative supplies such as those available to you through emergency interties or through accelerated recycled water projects and Zone 7 strongly urges you to do so.

Zone 7 staff are preparing updated tables for each retailer, outlining projected deliveries by turnout based on providing 75% of your requested deliveries and a focus on reduced outdoor water use. It is important to note that with this year's reduced supplies, if more water is taken earlier in the year, less will be available later. We hope to distribute the updated tables by the end of this month.

If you need any additional information or have any questions, you can reach me at 925 454-5016

or by email at jduerig@zone7water.com.

Sincerely,



G.F. Duerig
General Manager

cc: Carol Mahoney
Robyn Navarra

Zone 7's Stage 2 Action Plan to Reduce Demands by 25%

REDUCE INDOOR WATER USE BY AT LEAST 5%

- Water service in restaurants to be provided only when requested.
- Check your home's water meter to see if you have a leak (directions are posted at http://h2ouse.org/action/details/action_element_contents.cfm?actionID=F56F50F2-34E3-4095-9A919C304D945B5F&elementID=FCC1BED3-B2D1-4253-A3D07864BBA98629&parentPage=Take%20Action/action/index.cfm).
- Leaks are prohibited. If you find a leak (even a small one), arrange for it to be repaired as quickly as possible.
- Rebate programs for water –efficient appliances, low-flow toilets (replacing older, high-flow toilets) and waterless urinals will remain available while funds last (first come, first served)

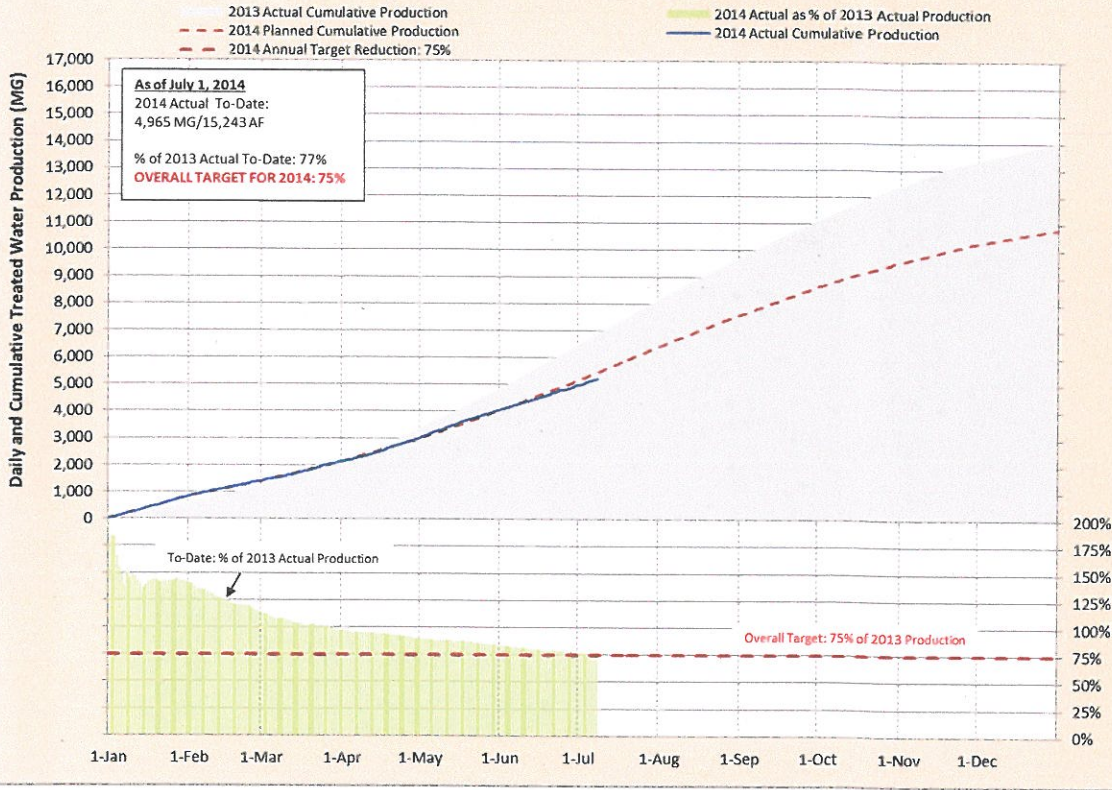
REDUCE OUTDOOR WATER USE BY AT LEAST 50-60% (these limitations apply to outdoor use of tap water, only; they do not apply to applications or use of recycled water)

- The following practices are **prohibited** during the Drought Emergency
 - Watering while it's raining or less than three days after a rain event
 - Any irrigation that results in ponding, flooding, excessive runoff or marshy conditions
 - Watering during daylight hours, due to the higher evaporation rates
 - Filling a new swimming pool or draining and subsequent complete refilling of existing swimming pools (in some extremely limited situations related to health and safety needs and localized groundwater conditions, waivers may be considered)
 - Refilling (topping off) swimming pools that are uncovered when not in use
 - Use of non-recycling decorative water fountains
 - Using hoses without quick-acting positive shutoff nozzles
 - Hosing off sidewalks, driveways, building exteriors, etc.
 - Any use of potable water related to street sweeping, sewer maintenance, gutter flushing, etc.
- Lawn and Landscape Irrigation Limitations
 - April – May: Water no more than once per week
 - June – September: Water no more than twice per week
 - October – November: Water no more than once per week
 - December – March: Do not water (landscape can be dormant)

- Outdoor Landscaping Improvements
 - Zone 7 will continue to offer outdoor rebate programs - lawn replacement rebates will be broken into up-front funding for lawn removals and replacement with sheet-mulching - plantings shall be deferred until the Fall rains begin (since new drought-tolerant plants require water during the period of establishment) and the remainder of the rebate will only be available after such Fall plantings have been completed. Single-family residential WBIC rebates are being discontinued during the drought due to irrigation limitations outlined above.
 - Zone 7 has developed a new menu of incentive programs for untreated water users. The programs will vary based on the specific site profile and will offer incentives for irrigation hardware upgrades and site monitoring.

[Note that, as with potable water customers, agricultural (untreated water) customers will be provided no more than 75% of their projected demands (i.e., untreated water customers must also reduce their demands by at least 25%).]

Cumulative Treated Water Production (MG)



Monthly Average Treated Water Production (MGD)

