

March 12, 2015

(3/17-18/15) Board Meeting- Item 7
Urban Water Emergency Regs
Deadline: 3/16/15 by 12:00 noon

The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk of the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: Additions to Emergency Drought Regulations

Dear Chair Marcus and Members of the Board:

The Santa Clara Valley Water District (District) appreciates the State Water Resources Control Board's (SWRCB) continuous efforts to raise awareness of the ongoing drought and pursuit of further reduction of water use throughout the state. As the water supplier to 1.8 million people in Silicon Valley, the District must manage this precious resource while balancing the diverse water needs of our residents, multinational corporations, and agriculture community. To do so requires a number of tools, including the increasingly critical tool of conservation and our growing need of recycled water.

The District is urging users throughout Santa Clara County to cut back on their use and to be mindful of the impact their actions have on the water supply. To that end, the District's Board of Directors approved a resolution setting a countywide water use reduction target equal to 20 percent of 2013 water use through December 31, 2014, and recommended that retail water agencies, local municipalities, and the County of Santa Clara implement mandatory measures as needed to achieve the 20 percent water use reduction target. This call for 20 percent reductions was extended on November 25, 2014, and remains in place through June 30, 2015.

While the SWRCB works to determine additional conservation measures to address this historic drought, the District would like to offer some suggestions that could assist water suppliers across the state in managing this limited resource. In addition to the current restrictions, we suggest the following:

Prohibited Activities

We request the following be added to your current restrictions:

- Prohibit outdoor irrigation when it is raining.
- Require water agencies to limit days (e.g. 1–2 days) per week and time of day for irrigation (limits can be set based on local conditions).
- Prohibit the use of potable water for ornamental fountains or similar decorative water features.
- Require use of non-potable/recycled water (where reasonably available and cost-effective) for irrigation, construction, soil compactions, and dust control.



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- Require hotels and motels to offer guests the option of not laundering towels and linens daily.
- Require restaurants, hotels, cafeterias, or other public places where food is sold, to only serve drinking water upon request.
- Require restaurants to use water-efficient pre-rinse spray valves.
- Require retail water utilities to notify customers when a customer side leak is detected.

Water Recycling

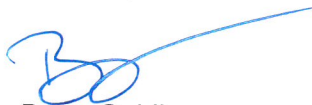
The District also recommends the SWRCB use this as an opportunity to further expand and accelerate the production and use of recycled water, including:

- The SWRCB should provide regulatory support/approval and state funding to encourage water utilities that produce recycled water to offer filling stations for residential and commercial, industrial, and institutional customers during critical shortages;
- The SWRCB should pursue streamlining of permitting and environmental review for recycled water projects;
- The expansion of water recycling through potable reuse is critical if California is to effectively respond to future droughts and develop a more resilient water supply. The SWRCB must ensure that adequate resources and funding are dedicated to the timely completion of regulations regarding new uses, such as augmentation of surface water storage, as dictated by state law; and finally
- The SWRCB should lead the discussion with the Administration and the Legislature to encourage and promote legislation that would cut red tape for local communities to install, maintain, and operate recycled water pipelines, also known as “purple pipes.” The remedy could be modeled after Public Resources code section 21080.23 which provides an exemption for gas and oil pipeline projects of less than eight miles that consists of the inspection, maintenance, repair, restoration, reconditioning, relocation, replacement, or removal of an existing pipeline.

By adding these resources to the toolbox, the District and water suppliers across the state could more easily provide guidance to residents and businesses to help them decrease water usage and exceed the goal the District Board of Directors set of 20 percent voluntary reduction in water use.

Thank you for your consideration of these recommendations. If you have any questions, please do not hesitate to contact me at (408) 265-2600 or bgoldie@valleywater.org.

Sincerely,



Beau Goldie
Chief Executive Officer

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