



Comments/concerns from a retail agency perspective on the proposed amendments to the Emergency Regulations for Urban Water Conservation.

- A prohibition on irrigation of turf or ornamental landscapes during and 48 hours following measurable precipitation
 - *A retail agency with large service areas does not have a practical ability to enforce this proposal effectively. What constitutes a measurable rainfall is an issue unless an undisputable reference is established. Currently we do not have such a reference. Most customers are irrigating after normal business hours and being able to have appropriate staffing to cover vast areas for violations would be problematic to do this in person. This rule has good intentions but troublesome when it comes to enforcement of this restriction if days of the week are already being limited. If any violation would be challenged by customer how would an agency confirm such violation? Would dedicating staff to patrol and take photos at all hours of the day providing a date/time stamp or pulling data logging on AMR meters hold up before a judge?*

For a hypothetical example: What if an agency had 10,000 smart data logging AMI meters and say 50% showed nighttime water use indicative of irrigation on the properties within 48-hours of "measurable" rainfall. Would an agency then be able to fine all customers in violation \$500 which could be \$2,500,000 in fines sent to customers? Just trying to think this through from a start to finish perspective. I'm not sure there is an agency in the State capable of fair and equal enforcement of this restriction.

- Hospitality sector restrictions requiring that water only be served on request in restaurants and bars, and requiring the operators of hotels and motels to offer patrons the option of not having their towels and linens washed daily.
 - *It would be good to have State level ongoing marketing outreach support for these restriction efforts. The linens and towel reuse at hotels and motels is something a manager of such business would be interested in offering from an economical business sense perspective. Retail water agencies would not have enforcement capabilities and inspecting each room for such notification compliance is not practical. In Southern California, most hotels are already doing this without a mandate from the state. Maybe outreach and marketing is all that is needed on this statewide concern for long term gain. It would be wise to have one statewide marketing effort providing one message, one uniform table top tent, etc. to get the word out on this effort instead of delegating enforcement to a multitude of water agencies which could add confusion and or duplication of effort.*

- A requirement for urban water suppliers that do not already have a limit on the number of days that outdoor irrigation of ornamental landscapes or turf with potable water is allowed, to limit such irrigation to no more than two days per week.
 - *No Comment*
- A requirement that urban water suppliers promptly notify their customers when they are aware of leaks within the customer's control.
 - *No Comment*
- Additional reporting requirements for urban water suppliers on compliance and enforcement efforts being undertaken within their service areas.
 - *No Comment*
- Clarification that small urban water suppliers are required to limit outdoor irrigation of ornamental landscapes or turf with potable water to no more than two days per week or implement other mandatory conservation measures intended to achieve a 20 percent reduction in water consumption.
 - *No Comment*

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