

Comment Letters

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**From:** Aileen Dalen [mailto:adalen@m-w-h.com]  
**Sent:** Tuesday, January 05, 2016 10:53 AM  
**To:** Frevert, Kathy@Waterboards  
**Cc:** Anna Ferrera  
**Subject:** Comments on Proposed Regulatory Framework  
**Importance:** High



Comments on the proposed modifications to the Water Emergency Regulations from the School Energy Coalition (SEC):

The School Energy Coalition (SEC), an organization made up of K-12 schools, community colleges, school construction and energy consultants focused on energy and water efficiency and renewable generation projects for California's students, appreciates and supports the consideration being given and the adjustments being made per climate, population and areas that had already improved their conservation efforts. As you know, schools are located in every community in the state and are usually considered large water consumers due to the necessary maintenance of sports fields, physical education areas, and other gathering places such as quads that must be kept in safe condition for students.

Since the Governor's Executive Order and conservation mandates to carry it out, the School Energy Coalition has been informing and assisting K-12 schools in meeting these required water reductions. This water conservation issue has been added to school facility concerns as part of regular maintenance and operations and to be considered with every new construction and modernization project being considered.

Schools have had to get up to speed quickly to do outreach with local and regional water administrators, along with the students, parents, and the communities they serve, regarding the new rules. Some school districts have several local water suppliers they need to have conversations with about how they are going to be carrying out the mandate. There is very little funding available for school projects of any kind and changes to address water conservation may require an investment of time and resources to order to comply.

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SEC understands and appreciates the need to respond quickly to the ongoing drought emergency and that these rules have been extended through Executive Order to give regulators authority to enforce the conservation targets through October 31, 2016, provided that California still faces a drought. In addition to our support of the changes, we are concerned and hopeful that some sort of credit may be given for the use of recycled or captured water use. Schools have been looking very seriously at purple pipe and infrastructure that would allow this where possible and this would be a great incentive.

Please contact me with any questions you may have regarding these comments.



*Anna Ferrera*  
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School Energy Coalition  
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**Background:**

On April 1, 2015, Governor Brown issued an Executive Order on actions necessary to address California's drought. On May 5, 2015, the State Water Resources Control Board (State Water Board) adopted an Emergency Regulation to address specific provisions of the April 1 Executive Order, including a mandatory 25 percent statewide reduction in potable urban water use between June 2015 and February 2016. To reach the statewide 25 percent reduction mandate, the Emergency Regulation assigns each urban water supplier a conservation tier that ranges between 4 and 36 percent based residential per capita water use for the months of July – September 2014.

On November 13, 2015, Governor Brown issued Executive Order B-36-15 (EO B-36-15) calling for an extension of urban water use restrictions until October 31, 2016, should drought conditions persist through January 2016. Between August and November 2015 State Water Board staff convened a small group of individuals representing a variety of water interests to further explore potential modification of the Emergency Regulation. The State Water Board also held a public workshop on December 7, 2015, to solicit input on elements of the existing Emergency Regulation, if any, that should be modified which led to the development of several proposals which the School Energy Coalition (SEC) is pleased to comment on.