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Santa Margarita Water District

April 13, 2015

Ms. Jessica Bean
1001 I St.
Sacramento, Calif., 95814
Jessica.Bean@waterboards.ca.gov

Dear Ms. Bean:

Santa Margarita Water District (SMWD), the second-largest retail water agency in Orange County, appreciates the State Water Resources Control Board's (SWRCB) prompt action in addressing Gov. Brown's Executive Order regarding water-use reductions. We also appreciate the opportunity to comment on the Board's framework for implementing the new regulations.

SMWD has taken several steps already to meet the 25% reduction. We recently held a successful Proposition 218 hearing to implement a water budget rate structure for our customers. We have a robust program converting large irrigators to recycled water which we estimate will save close to 2,500 AF. To facilitate enhanced water management, the District is installing weather stations throughout our service area at a significant expense. We are coordinating this effort with the Department of Water Resources to incorporate these stations into the statewide CIMIS network.

Our specific concerns about the framework primarily center on the need for clearer definitions and for more locally based coordination. To ensure that the framework will gather accurate information useful in reaching the Governor's mandated 25 % reduction in urban water use, we offer the following suggestions:

- Simplify the process by examining month-by-month water-production data from 2013 and multiplying those figures by 0.75 (75%) to give water suppliers monthly water-use targets and a 12-month goal. This provides the water purveyors the broadest range of opportunities to reduce water consumption while also recognizing the diversity of California water agencies. Water production is equal to the amount of water purchased from a wholesaler or produced by the agency for distribution to its customers.
- A clear and consistent definition of the term "Water production data" should be used when calculating R-GPCD. Does "production" mean water produced as noted above and put into a distribution system or is it water sold to customers? SMWD would recommend "production" clearly be defined as potable water produced/purchased and that the R-GPCD reflect the metered water sold to residential customers.

Additionally the dates for the monthly comparison numbers could be clarified and directly called out in the monthly Urban Water Supplier Reporting Tool. For example, should January 2016 data be compared to January 2013 or January 2014?

- The formula used by SWRCB to determine 2013 water use with 2015 population figures will create faulty data in determining the 2013 R-GPCD. Monthly 2013 population values should be used to calculate monthly 2013 R-GPCD values. SWRCB should work with agencies to

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both clearly document population numbers and to use a single source for current and 2013 months to normalize for population growth.

- Collect Commercial, Industrial and Institutional (CII) water use data at an aggregated level and provide a clear definition of what constitutes CII water use. If dedicated irrigation is not included in the R-GPCD numbers, that changes the level and type of outreach completed by all water purveyors.

Additionally, growth and economic recovery in the CII sector could be recognized by reporting on the number of CII accounts to normalize CII water use and to take into consideration the overall health of the economy and development within an agency's service area. CII water use reporting could make clear differentiation between potable and non-potable water use to ensure that agencies such as SMWD that have made significant investments in utilizing non-potable water are recognized and agencies that can disaggregate CII water use based on their billing database could have the option to do so. The charts in **Attachment A** demonstrate how CII water reporting could be accomplished.

- We appreciate that the proposed enforcement actions increase in severity. Enforcement actions should be judicious to allow districts the opportunity to bring online water-saving programs and facilities.
- Clarify the requirement for new homes to use drip or micro-spray. Water districts do not review permits or issue approvals for homeowner-installed systems beyond the meter. Water districts can require this of master developers, especially those installing irrigation systems, in connection with approval of will-serve letters or development agreements. The State could require municipalities to require this in connection with building or occupancy permits and could require State Uniform Codes to mandate these as conditions of those permits. The State could also direct homeowners associations to make alterations to their Codes, Covenants and Restrictions regarding sprinkler design, as those bodies would be best able to enforce such regulations.
- Define "Median," in the restriction against potable water being used for irrigating turf, as property between two lanes of traffic.

With 155,000 customers, SMWD is supportive of all efforts for reductions in urban water use during the drought and into what is clearly the "new normal" for California. We hope our suggestions will result in better measurements of water use so that we can collectively reach the Governor's target reduction.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

SANTA MARGARITA WATER DISTRICT



Daniel R. Ferons
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Attachment A

CII Reporting					
	Potable Water Use	# of Accounts	Water Use per CII Account	Non- Potable Water Use	# of Accounts
Total CII*					
<i>* CII = all commercial, industrial, institutional, and dedicated irrigation accounts (if an agency has these)</i>					
OPTIONAL:					
Agencies that Have the Ability to Disaggregate					
	Potable Water Use	# of Accounts	Water Use per CII Account	Non- Potable Water Use	# of Accounts
Commercial					
Industrial					
Institutional					
Dedicated Irrigation					