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**Subject:** WUE UAG Meeting Comments  
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Comments on the UAG Meeting;

I want to thank DWR and the SWRCB for the WUE UAG and the opportunity to make input as a member of the public on this critical process. My comments are as follows:

## General Comments

**What Are We Trying to Achieve?** - During the UAG Workshop, this question was asked several times by different people. The response from the SWRCB and DWR staff was, "we have to do better at conservation," or "we have to achieve a greater level of savings." The success of these policies will depend upon the public's understanding of the problem and acceptance of the solution. Imposing very restrictive standards for indoor, outdoor, and CII water use, without a reason, a problem or a goal, will be very difficult to sell to and get buy-in from the public. Doing it by blunt force (fines, prosecution, etc.) will not be politically sustainable at the state or local level. The state needs to articulate what the problem *is* and what needs to be achieved to solve the problem. **Clarity of message on just what it is we are trying to achieve and why will be critical to the overall long-term success of this effort.**

**Timeframe for the WUE Process** - For something this important, with the potential long-lasting, sea-change impacts, ***this process needs more time***. It would be better to take a full year to development these policies with an eye toward the 2018 legislative year, and to get it right rather than rush to meet the January, 2017 deadline. The 2009 Water Package took three years and what we are working on now is much more far ranging and impactful than SB X - 7X. **As a whole, the water community will be better able to fully support and implement policies which have been more fully developed and vetted.**

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**Water Agencies Are Utilities, Not Social Engineering Agencies** - Water agencies are, after all, utilities and probably not the best suited instruments to affect significant changes in social values and mores. Real social change comes through broader, more influential social structures, such as the state or the educational system, and not through water service rules, regulations and rate structures. **In a parallel effort, the state needs to conduct a significant long-term educational and media effort focused on changing the way Californian's think about water while water agencies work on changing the way they operate to meet the water needs of their respective communities.**

## Definitions

**Efficiency/Conservation/ Extra Ordinary Conservation** - The “mpg, miles driven analogy” was interesting. **However, the state needs to develop more formalized definitions of “water use efficiency,” “conservation” and “extraordinary conservation.”**

**Water Waste** - Since the prevention of water waste is at the core of this effort, the state needs to define what is water waste. The definition needs to be such that a reasonable person knows it when he/she sees it or does it. **How about, “water waste shall be deemed to be water expended or utilized with no recognizable human, economic or environmental benefit...”**

## **Drought Plans**

**Drought/Shortage** - As we now know, the state can be in a drought, but that does not necessarily mean there is a supply shortage everywhere. The state needs to define the difference between “Drought” and “supply shortage.” **Asking the people to respond with extra-ordinary water conservation measures without the existence of an actual shortage in their community or local will creates credibility issues and could result in a lack of needed response in the case of an actual shortage.**

**Drought Response Plans** - In a state as large and varied as California, one size will not fit all when it comes to drought response plans. State regulations should identify certain mandatory operative features (quick response, progressive levels of response, mechanisms to enforce mandatory measures, etc.) which should be present in every plan. Beyond that, the regulations could identify a suite of optional measures proven effective elsewhere which can be utilized by a water agency to achieve a certain level of response, based upon the nature and character of the community served. Finally, a measure which achieves a greater water savings result in one community may not be effective in another and the water agency should have the discretion to make that decision. **A water agency should also have the ability to design and develop its own measures customized to meet the needs and characteristics of its service area.**

## **Water Waste Reduction Through Efficiency Standards**

**Basis for Indoor/Outdoor Standards** - **On what subjective or objective basis were or will these standards be established, and what objective goal will be achieved or what problem will be solved when we reach those standards?**

**Compliance Options** - 20% by 2020 was effective in that it provided four compliance options and interim goals for compliance. That provided water agencies the ability to choose the option best suited to its community and agency resources to achieve compliance. It also gave an agency a 10 year period with interim milestones to develop and gain public acceptance of the need to reduce water use by 20%. These new regulations need to be modeled after the 20%~~X~~2020. There needs to be a clear goal, such as **30%~~X~~2030** (similar to SB 350 RPS requirement approach) with interim milestones. **Despite what some say, the data clearly shows that 20%~~X~~2020 has been successful and extending this structure but raising the bar by a reasonable amount may be**

equally successful.

**Phasing and Adequate Time Periods for Implementation - *Whatever is ultimately implemented, there needs to be an adequate period of time (10 years) for communication and education to gain public acceptance, while water agencies develop the resources to acquire and deploy the technologies (meters for some communities and advanced meter technologies/customer access to real-time analytics for most communities already having fully metered services) and policies/processes to implement the new requirements.***

## **Water Loss Reduction**

**Water Loss** - As the water loss factor drops, achieving the next increment of saving becomes more capital intensive and expensive. At some point, the cost of achieving the savings can exceed the cost of the water saved. **Any new water loss standard needs to recognize this cost/benefit factor and at some level of achieved loss reduction, allow water agencies to prioritize how they invest their limited capital and operational dollars.**

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Again I want to thank you for the opportunity to participate and comment. I trust my comments will be reviewed and hope that they prove to be of some value in the overall process. I would be more than happy to discuss them with a member of the SWRCB or DWR staff.

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