

**From:** [McKinney, Kelye](#)  
**To:** [DWR Water Use Efficiency](#)  
**Subject:** REvised RE: EO B-37-16: Comments for UAG  
**Date:** Monday, August 29, 2016 10:14:06 AM

---

Please use revised message below:

Thank you,  
Kelye

**Kelye McKinney, PE**

Assistant Environmental Utilities Director  
City of Roseville  
2005 Hilltop Circle  
Roseville, CA 95747  
(916) 774-5552

---

**From:** McKinney, Kelye  
**Sent:** Monday, August 29, 2016 8:29 AM  
**To:** 'wue@water.ca.gov' <wue@water.ca.gov>  
**Subject:** EO B-37-16: Comments for UAG

Good morning, as offered at the 8/12/16 UAG meeting attached are a few comments the City of Roseville would like to submit for consideration by the UAG.

- The final “WHEREAS” of Executive Order B-37-16 calls to establish measurable actions that “Make Conservation a California Way of Life . To meet that objective, the state must engage other community sectors beyond just water agencies. In particular, the state should consider how Parks Districts, School Districts, Business Community, Industrial and Manufacturing Sectors and Fire Service Industry (there may be others) can participate in achieving this objective. Requirements for additional efficiency/conservation must not be places solely on water providers. The end user must also be engaged. For example, should the fire industry and fire districts be required to report to their water agency the volume of non-revenue water they use for things such as fire flow testing, filling water tanks in trucks/planes, pressure testing fire hoses, sprinkler testing, training etc.? While this is in no way should be an attempt to limit the amount of water used by fire agencies to perform their primary community safety duties they may need to help with the accounting of water use so that agencies can better understand their true water loss.
- The issue of improving upon 20x2020 requirements:
  - Whatever is determined here must remain flexible. Agencies must be able to report as R-GPCD in addition to or in lieu of GPCD. For communities such as Roseville where 40 to 50% of our water demand is for the CII community and our day time population exceeds our night time population as a job center, reporting only GPCD

is unfair as our numbers are skewed when compared to other communities that are dominated by residential demands.

- Steer away from telling water agencies how they must achieve results. For example do not mandate number of watering days.
- EO2 requires the State develop new water use targets as part of a permanent framework for urban water agencies. It also states the targets shall be customizable to the unique conditions of each water agency. It is suggested the State develop guidelines on ways in which water agencies would establish their own targets and methods to measure and achieve them.
  - Targets should not become water budgets, but remain truly as targets. It must be acknowledged that the sum of all targets (if considered a water budget) will change annual as land use changes take place and growth occurs.
  - Indoor Residential: Targets must be customizable for an agencies demographics. For example indoor residential should provide allowances for things such as pets/livestock that may reside on a residential property, swamp coolers, and age of the home.
  - Outdoor Irrigation:
    - Targets should be based on irrigatable area (site size less building area). Just because some areas are not irrigated today, does not mean it won't be in the future. It should be acknowledged that irrigated area on a parcel is likely to change over time. For example business that want to beautify a property may convert hardscape spaces to soft scape. Or landscape may be changed. For example there is general no irrigation within the drip line of an oak tree – not good for the oak. However when an oaks dies and is removed that space maybe changed and may include new landscaping with irrigation.
    - Consider guidance that encourages development standards to require the irrigation meters separate from indoor meets for CII properties only when irrigable area exceeds a certain square footage or percentage of the site.
    - It must be acknowledged that targets will change
  - CII:
    - The state should consider ways in which the end user should be accountable for water conservation efforts as opposed to placing the responsibility fully on a water supplier. In most cases, the water supplier has limited ability to dictate the amount of water a user may use. For example CII customers (or maybe a subset of CII customers) should be required to file a “water

audit” every x number of years with the state and their local water supplier that seeks to identify opportunities for water efficiency and develop a plan to address areas for improvement. In concert with this the State should provide guidance/resources to the business community such as free audits and information on ways to increase efficiency by general business sector.

- If hard targets are to be established for CII it may have the unintended consequence of precluding business from expanding or community intensification. If CII targets are established they should be done in a way that recognizes various land use zonings such as community commercial, vs business professional, vs light industrial, vs industrial and perhaps include a range as opposed to a single value.
- It should be acknowledged that the targets for the CII sector in a community will be continually changing as growth takes place, as land use changes occur (such as zoning changes), and as businesses expand/intensify in a community. One potential way is to establish targets that recognized intensity of development such as floor-area-ratios. However, this must be carefully considered as the effort by water agencies to track in this fashion would be resources intensive. It could be that land use agencies should have some level of reporting responsibility to local water agencies to document these changes should a method like this be considered.
- One possibility to address CII might be to allow water agencies to use their planning level water demand factors for CII to establish their own individual CII targets. For example we use 2,598 gpd/acre for community commercial land zoning (includes irrigation). This assumes the property is constructed at a floor area ratio not exceeding 30%. If a project proposes something greater, the factor is discounted for estimated outdoor irrigation needs and then scaled up accordingly. This allows each water agency to customize their CII targets based on their unique community needs and to individual parcel needs. Agencies can then monitor water usage against the planning level demand factors to ensure that on a whole the CII community is not exceeding estimated needs. Water agencies could be required to evaluate their CII target (aka planning level demand factors) once every 10 years and adjust (likely downward) as water efficiencies take place (if combined with the water audit requirement).
  - Leaks: Targets should be established as a percentage or use or should take into account the length of water system. SB 555 should be the basis of this element.

-  
Please let me know if you have any questions or would like to discuss.

Thank you,  
Kelye

**Kelye McKinney, PE**

Assistant Environmental Utilities Director

City of Roseville

2005 Hilltop Circle

Roseville, CA 95747

(916) 774-5552