

From: [Gary Arant](#)
To: [DWR Water Use Efficiency](#)
Cc: [Brostrom, Peter@DWR](#); [mstapleton@sdcwa.org](#); [Yamada, Robert](#); [dfrieauf@sdcwa.org](#); "Paul Helliker" ([helliker@hbmwd.com](#)); [jwoodling@rwah2o.org](#); [bgoshi@mwadh2o.com](#); [cpieroni@SANDIEGO.GOV](#); [JimPeifer](#) ([jpeifer@cityofsacramento.org](#)); [Mary Lou Cotton](#) ([mlcottonwater@gmail.com](#)); [Tim Quinn](#); [Cindy Tuck](#); [Dave Bolland](#); [GraceChan](#) ([gchan@mwadh2o.com](#)); [ianp@camrosa.com](#); [justinf@mesawater.org](#); [penny.falcon@ladwp.com](#); [jberg@mwdoc.com](#); [DUpdahyay@mwadh2o.com](#); [nschneider@MojaveWater.org](#); [scotulla@stpud.dst.ca](#); [lovested@emwd.org](#); [Joone Lopez](#)
Subject: WUE Water Use Targets - Comments on the September 6, 2016 Workshop, Oakland.
Date: Tuesday, September 13, 2016 3:19:15 PM

WUE Targets Process;

I would like to provide the following written comments on the WUE Workshop held in Oakland on September 6, 2016:

Adjustments for Indoor Residential Efficiency Standards- We heard that over-time, improvements in indoor water use efficiency will occur as a function of new fixtures and appliances in existing homes and new homes. If the 55 gpcd standard starts in 2025, then the statewide data should be monitored to see if the anticipated decline occurs. If we don't see the anticipated declines by 2030, then at that time the standard may be adjusted if necessary and appropriate. In other words, as the increased water use efficiency imbedded in fixtures, appliances and plumbing codes, along with practices and habits takes hold, the WUE standard for Indoor Residential Standards may self-adjust without any further change in regulation.

Wastewater Treatment/Recycling and Potable Re-use - As others have expressed, there is a gpcd level for in-home use which will start to have negative impacts on wastewater collection systems, treatment and disposal processes and costs, as less liquid associated with in-home conservation will not reduce solids and BOD loading in the waste stream. Has there been , and if not, there should be some level of consultation with the wastewater community on this issue.

The other factor is that lower wastewater flows will reduce the volumes of wastewater available for recycling and potable re-use. Has there been some analysis of these impacts and the detrimental effect on the state meeting stated goals for water reclamation and potable re-use?

While lower levels of in-home gpcd may be technically feasible and desirable for some, there may be financial and environmental trade-offs which off-set the benefits of the extreme levels of water use efficiency.

Irrigable versus Irrigated Acreage - Allocations for outside irrigation must be based upon **Irrigable** Acreage, and not irrigated acreage for the following reasons:

1. Irrigated Acreage today reflects over two years of voluntary and mandatory outside water use reduction and as such is not reflective of normal water use;
2. Using Irrigated Acreage could disproportionately impact some communities and socio-economic sectors compared to others;
3. Using irrigated versus irrigable acreage could preclude the replacement of "dead" landscapes with new water efficient landscapes in some communities;

4. Even water efficient landscaping will require additional irrigation for several years to be established;
5. Using irrigated versus irrigable acreage does not account for new residential growth or decisions by an individual property owner to expand irrigated areas, even if it is with water efficient landscapes;
6. Using irrigated acreage would place the water agency in the position of doing real-time monitoring of landscape additions and changes which would be impractical to implement and add significant staff and resource costs to water agency operations.

Multiple ET Factors - Using multiple ET factor based upon age of home is impractical as water agencies may not have actual data on when a home was built and landscaping was installed. All existing residential ET adjustment factors should be placed at .8, and any new homes at the appropriate ET factor based on the state and local landscape ordinances in place at the time of land-use approval.

Animals/Livestock Water Allocations - People have animals as pets (cats, dogs), recreational uses, (horses) and livestock for non-commercial, personal food source and recreational uses (aviary, cattle, etc.) that all consume water. WUE regulations must account and allow for these demands. These types of uses were included in the overall "GPCD" approach, but there is no indication where these uses will be reflected in the new "Targets" approach.

Municipal/Public Health and Safety Uses of Water - Water used for municipal purposes (e.g., street sweeping), public health and safety (water system flushing, water quality testing, etc.,) and public safety (fire-fighting, hydrant flow testing) must be accounted for and considered in the Water Use Efficiency Standards. As with the previous comment, these types of uses were included in the overall "GPCD" approach, but there is no indication where these uses will be reflected in the new "Targets" approach.

Construction Water - Dust Control and Grading Compaction - Though variable and intermittent, these uses do occur and are critical to the construction of new infrastructure, residential and commercial development. These uses would not be necessarily included in CII to a predictable degree or at all. If no consideration for these uses is made in setting the WUE Targets, then a water agency will either have to deny the use, thus stopping the construction related economic activity, or take water away from other CII uses, to the economic detriment of those uses. As with the previous two comments, these types of uses were included in the overall "GPCD" approach, but there is no indication where these uses will be reflected in the new "Targets" approach.

CII WUE Standards - CII Water Should be split between outside and process water.

▪ **Outside Use** - Water for CII outside use should fall under the same WUE for outside irrigation except for special use areas (parks, athletic fields).

▪ **Process Water** - For CII Process Water, water agencies do not have and cannot be expected to develop the wide range of the expertise needed to evaluate, develop and implement WUE Standards for every manufacturing and processing application in a water

agency's respective service area. Not only is that impractical, it would result in a wasteful investment of resources on an agency by agency basis. It could also result in similar industries residing in different communities being placed under disparate standards to the economic disadvantage of one CII user compared to another.

A blanket 10% reduction could again result in disparate impact. As some CII users might have made the investments to be more water use efficient, and if required to reduce another 10%, then their only option may be to reduce production and employment by 10%. A competitor in the same community or in another community who had not made the same water efficiency investments could make the WUE investments and reduce water use without reducing production and employment and be in a superior competitive position compared to the company having made the WUE investments prior to 2013.

CII Process Water Use standards need to be developed cooperatively between the segments of the CII user community and the State Agencies which regulate them over the next three years. By 2021, CII process water users and the state regulating agencies need to come to agreement as to what WUE measures may be implemented to increase water use efficiency while preserving production, output levels and employment levels on a segment by segment basis. By 2025, the CII process water users will be required to self-certify to the appropriate state regulatory agency and the water supplier that they are WUE-Certified (similar to LEEDS -Certified), which will include a description of the measure taken and an estimated CII savings.

Such certification will be subject to review by the appropriate state agency and the retail water purveyor with verification based largely on the resulting change in water use, of course allowing for an increase in water use based upon growth in production.

As before, thank you for the opportunity to make written comments.

Gary Arant

General Manager

Valley Center Municipal Water District

(760) 735-4515 (Direct Office Line)

(760) 522-4024 (Cell)

garant@valleycenterwater.org