From:	Justin B. Finch, MPP
To:	DWR Water Use Efficiency
Cc:	Paul E. Shoenberger, PE; Stacie Sheek
Subject:	WUE Targets - Comments/Suggestions
Date:	Wednesday, September 14, 2016 8:07:57 AM
Attachments:	image001.png

Mesa Water's suggestions for DWR's consideration.

- **Target Framework**
  - **Proposed Framework**: Mesa Water suggests to DWR that they consider a 25% by 2025 or 30% by 2030 Target as an *additional option for compliance*, versus only having one option which was only utilized by 3 of 400 agencies. Agencies simply need more compliance options for achieving water savings, not fewer.
- **Indoor Target**: 55 GPCD
  - **Support.** This is accepted as a standard utilizing current plumbing standards and current flow/flush standards. Recent studies show single-family residential may use approx. 59 GPCD which includes common house-hold leakage, therefore 55 GPCD is a good standard. Future reductions should only be based on End Use studies not arbitrary goals.
- **Outdoor Irrigation**: irrigable vs irrigated land
  - **Irrigable**: Irrigable area gives the agency/community more flexibility as customers choose to irrigate or not irrigate their property based on individual finances and/or drought. Irrigable area also requires fewer flyovers or customer contacts to update acreage. We agree with the State that irrigated area disproportionally gives lower budgets to disadvantaged or lower-income communities that may not be irrigating their full property. Finally, irrigated area would give an agency a false sense of security, that could cause an agency to go over budget if customers suddenly turn the sprinklers back on.
- **Outdoor Irrigation**: ETAF for pre-1993 landscapes:
  - **Pre-1993 Landscapes should be given ET Adjustment Factor of 1.0.:** According to the 1993 MWELO (http://www.water.ca.gov/wateruseefficiency/docs/WaterOrdIndex.cfm) under Section 493. Provisions for Existing Landscapes, it is prescribed that existing landscapes may be required to be audited based on water usage, but there is no requirement that they are brought up to the 1993 MAWA standard. Therefore it is unreasonable, unequitable, and inefficient to assign a mandatory ETAF of 0.8 if the site was not originally designed with this standard in mind. An ETAF of 1.0 provides for measures of efficiency and does not overly penalize a site for being older.
- **CII Water use**: BMPs versus a straight % reduction.
  - **BMPs**: Agencies should make a reasonable effort to perform BMPs as detailed/prescribed by the agencies for their CII sectors which can be quite diverse and complex. A straight % reduction may hurt industry.

- **Water Loss:** State's proposal: require 'large' water suppliers to conduct component analysis to identify cost-effective water loss detection and control actions.
    - **Support:** This is the basis for which direction to go moving forward in reducing actual water loss.
    - **Proposed Standard:** Infrastructure Leakage Index (ILI) – "the ratio of the Current Annual Real Losses (Real Losses) to the Unavoidable Annual Real Losses (UARL). The ILI is a highly effective performance indicator for comparing (benchmarking) the performance of utilities in operational management of real losses" as defined by AWWA.

Additional questions to be answered

- **Indirect (and Direct) Potable Re-use…**
    - **Credit**. Under SBx7-7, indirect potable reuse water is treated the same as recycled water (purple pipe), and it should continue to be treated as such. This incentivizes water agencies to develop drought-proof local supplies of water.
- **Agricultural water**
    - **Credit**. Under SBx7-7, agricultural water is excluded from urban water use, and it should continue to be treated as such. This incentivizes water agencies to provide water to locally grown/raised agriculture which lowers our State's carbon-footprint.

Thank you for the opportunity to provide comments and suggestions,
Justin

Justin B. Finch, MPP
Resource Efficiency Specialist

1965 Placentia Ave • Costa Mesa, CA 92627
tel 949.207.5439 • dept 949.631.1200
JustinF@MesaWater.org • **MesaWater.org**