

From: [Jessica Parks](#)
To: [DWR Water Use Efficiency](#); [Brostrom, Peter@DWR](#)
Subject: Comments on Water Use Efficiency Standards
Date: Friday, September 16, 2016 12:27:28 PM
Attachments: [SFID Comments to SWRCB on water use standards.pdf](#)

Please find the attached comment letter from the Santa Fe Irrigation District. If you have any questions, please contact Jessica Parks at (858) 227-5799.

Sincerely,

Jessica Parks
Management Analyst
Public Information Officer
Santa Fe Irrigation District
(858) 227-5799 office
(858) 210-0798 cell
[*jparks@sfidwater.org*](mailto:jparks@sfidwater.org)
Follow us on Twitter @SFID

Santa Fe Irrigation District



September 15, 2016

California Department of Water Resources
Attn: Peter Brostrom
Water Use Efficiency Branch
901 P Street
Sacramento, CA 95814

State Water Resources Control Board
Attn: Jeanine Townsend, Clerk of the Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Delivered by email to: WUE@water.ca.gov
Peter.brostrom@water.ca.gov

Subject: Comments on Proposed Framework for New Water Use Efficiency Targets

The Santa Fe Irrigation District (SFID) appreciates the opportunity to provide comments on the development of the framework for setting water use efficiency targets related to the Governor's Executive Order B-37-16. In response to the proposals presented on September 5, 2016, in Oakland, and on September 8, 2016, in Los Angeles, SFID submits the following comments and recommendations.

General Recommendations

- Slow down the process to allow for sufficient time to test the proposed standards for each sector budget and to make refinements as necessary through a more comprehensive, interactive process. The long term water use efficiency framework should provide a broad policy outline on the approach to calculating the new targets, with details to be determined based on studies and testing.
- Any actions taken by the state should clearly distinguish between long-term water use efficiency and short-term, emergency water use restrictions.
- The proposed water use efficiency framework as proposed is not customizable to unique conditions of local water suppliers and is a "one-size-fits-all" approach. We recommend that multiple methods be developed to allow local water suppliers the ability to customize their own approach to a water savings target that is best suited to its community and agency. This could be accomplished in a manner similar to SBX 7-7, which provided alternative methodologies for local water suppliers to choose from to achieve water reduction targets.

Indoor Residential

- Any future indoor standards must be developed based on sound, technical studies that clearly demonstrate how efficiency will be achieved. (i.e., plumbing codes, appliance standards).
- A minimum indoor residential water use standard must be established to ensure wastewater flows are sufficient for proper operation of sanitary sewer systems.
- The compliance year for any new water use efficiency targets must be no earlier than 2025.

Outdoor Landscape

- Allow agencies to exclude their recycled water, potable reuse and desalinated water production totals from their water supply use totals when determining compliance.
- Allow water agencies to exclude agricultural water use from the outdoor landscape budget.
- Use **irrigable area** and NOT irrigated area. Irrigated acreage today reflects both voluntary and mandatory outside water use reductions and as such is not reflective of normal water use. In addition, the use of irrigable area accounts for landscape areas that will be irrigated in the future when drought conditions change or new, low water use landscape is installed.
- Provide variances to water suppliers to account for special outdoor water uses (e.g. livestock, environmental mitigation, etc.)
- Existing homes/landscape areas should start at an ETAF of 0.8, and any new homes at the appropriate ETAF based on the state and local landscape ordinance in place at the time of land-use approval. Using multiple evapotranspiration adjustment factors (ETAFs) based on the actual date the home was built becomes very complicated and impractical as water agencies may not have actual data on when a home was built and landscaping was installed.
- SFID recommends the state take into account the additional water supplier resources necessary to implement the proposed methodology and provide financial assistance to water suppliers to support implementation of any new water use efficiency targets.

Commercial, Industrial, & Institutional, (CII)

- CII irrigable area should be included in a water supplier's outdoor landscape water use target.
- SFID supports the development of best management practices for CII through the engagement of industry specific trade groups to develop proper standards.
- Provide variances to water suppliers to account for an increase in CII water use as a result of economic growth in the CII sector.

System Water Loss

- SFID supports the use of the SB 855 process to establish system water loss standards.
- SFID supports the year 2025 as the first year for water suppliers to achieve their system water loss standard.

- The framework needs to contain clear definitions on types of water loss, consistent with AWWA Manual 36, Water Audits and Loss Control Programs.

Thank you for the opportunity to provide comments on the proposed new water use efficiency targets. Please contact me at 858.756.2424 or mbardin@sfidwater.org with any questions or for additional information related to SFID's comments and recommendations.

Sincerely,



Michael J. Bardin
General Manager

Cc: Santa Fe Irrigation District Board of Directors