

From: [Michelle Curtis](#)
To: [DWR Water Use Efficiency; commentletters](#)
Subject: Comment letter - Draft framework for Water Shortage Contingency Plans and Long-Term Water Use
Date: Friday, September 16, 2016 9:18:41 AM
Attachments: [Comment Letter to DWR and SWRCB 091616.pdf](#)

Good morning,

Please see the attached comment letter regarding the proposed framework for water shortage contingency plans and long-term water use targets.

Thank you,

Michelle Curtis, CLIA
Senior Public Affairs Representative
Helix Water District
619-667-6261
www.hwd.com



Helix Water District

7811 University Avenue
La Mesa, CA 91942-0427

(619) 466-0585
FAX (619) 466-1823
www.hwd.com

Setting standards of excellence in public service

September 16, 2016

California Department of Water Resources
Attn: Marty Berbach, Senior Environmental Scientist
Water Use Efficiency
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

VIA EMAIL: wue@water.ca.gov; commentletters@waterboards.ca.gov

Re: Comment Letter – Proposal to Implement Executive Order B-37-16 through Water Shortage Contingency Plans and Long-Term Water Use Targets

Dear Mr. Berbach and Ms. Townsend:

On behalf of the Helix Water District, we would like to thank the Department of Water Resources and the State Water Resources Control Board for initiating an open and transparent process in the development of water shortage contingency plans and new long-term water use targets for urban water agencies.

Helix Water District is the 19th largest urban water supplier in California in terms of population served. Through our 106 million gallons per day R.M. Levy Water Treatment Plant, we provide treated drinking water to 271,000 district customers through 56,000 active connections and also sell treated water to four neighboring water agencies in eastern San Diego County.

The district has been committed to water conservation for almost three decades. We were an original signatory of the California Urban Water Conservation Council and a founding member of the Water Conservation Garden, a demonstration garden showcasing water-wise landscapes and efficient irrigation that was created in response to the drought in the early 1990s. The district also offers a robust array of conservation and outreach programs to customers, including classroom presentations for children, rebate programs, free landscape surveys and community outreach events. We have also employed a tiered rate structure to encourage efficient water use since the mid-1980s.

Helix Water District has long recognized that long-term planning is critical to a sustainable water supply. In addition to implementing measures to reduce demand, the district has also invested in regional alternative water supplies to reduce its dependence on imported water. These projects include the Carlsbad Desalination Plant and a partnership in the East

County Advanced Water Purification project, which would provide a new, local, sustainable and drought-proof drinking water supply using state of the art technology to purify East County's recycled water.

These efforts achieved a 34 percent decrease in water use between 1990 and 2013 as per capita water use went from 171 gallons per capita per day to 114 gpcd within our district, which was our 20 by 2020 water conservation target. Since the state mandates went into effect, our customers achieved an additional 21 percent cumulative reduction in water use, reaching a low 89 gpcd in April 2016. Unfortunately, these extreme savings have come at the cost of established trees and landscaping as many customers chose to stop watering completely.

These levels of savings, in a time when our region has sufficient supply to meet demand even if the drought continues, have significantly impacted our customers. The state mandates decreased the district's revenue by \$7.6 million with only 30 days' notice, which would have been catastrophic if not for our conservative fiscal planning. Even with the district's careful planning, customers were still faced with steep rate increases to ensure basic services and system maintenance could be maintained. This was especially difficult for our customers to understand as they had paid for investments in alternative supplies over the past decade that were not accounted for under the state regulations.

In light of these challenges, Helix Water District would like to make the following recommendations for the development framework for water shortage contingency plans and long-term water use targets in hopes of developing a more thoughtful, reasoned approach:

Long-Term Water Use Targets

- Issue a broad framework by January 2017, but extend the deadline for the development of these permanent requirements to no earlier than 2025 to allow adequate time to evaluate and incorporate results from the studies currently being conducted and the pilot testing.
- Indoor residential per capita water use:
 - Initial factor should be 55 gpcd.
 - Ensure future gpcd standards take into account adverse impact on wastewater systems.
 - Any future standards must be developed on sound, technical studies. If revised, water suppliers should receive a minimum 36 month notice to adapt outreach programs, if necessary, before the new standard goes into effect. Our customers simply can't afford expensive retrofits to meet sudden state mandates, nor does the district have funding available for an expanded rebate program.
- Outdoor irrigation:
 - Keep the framework broad until the results of this fall's pilot study involving 30 water suppliers to test irrigation calculations are verified and available.

- Use irrigable acreage, not irrigated acres. Today's irrigated acreage reflects both voluntary and mandatory water use reductions and is not indicative of normal, sustainable outdoor use, as many customers have stopped watering entirely. Using irrigable acreage will allow for those customers to replace grass with climate appropriate landscaping and to replace trees that have died due to drought and state mandates.
 - Make sure aerial imagery tool has the capacity to accurately measure slopes.
 - The state should provide updated landscape area measurements to water agencies annually to ensure accuracy.
 - Provide a mechanism for adjusting landscape area measurements if water agencies ground truth a representative sample within their service area and find discrepancies with the aerial imagery measurements.
 - Using multiple evapotranspiration adjustment factors 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 installed, especially for those that have multiple planning agencies within their service area. Therefore, all existing landscape areas should start at an ETAF of 0.8, and any new landscapes should be calculated at the appropriate ETAF based on the state and local landscape ordinance in place at the time of land use approval.
 - Outdoor budget must be able to include "non-landscape" water use, such as livestock or medical needs.
 - Provide funding for local staffing to support the verification and maintenance of the continually changing landscape of an agency's service area.
- Commercial, industrial and institutional:
 - Include CII landscape in the overall landscape area. In areas developed decades ago, separate irrigation meters were not installed. Requiring this would be too expensive and could require huge financial investments when the same data could be more easily obtained by including it with the overall landscape area measurement.
 - The state should establish best management practices for different industries. A flat percent reduction should not be used for CII accounts as this has the potential to stifle growth and economic expansion.
 - With respect to providing individual water audits to CII customers, water agencies do not have staff with the required specialized knowledge to conduct those evaluations and to hire consultants is cost prohibitive for both the agency and the business. A better use of the state's experts and resources would be for the state to create water efficient guidelines for industry groups such as hospitals, hotels, etc. to utilize. CII accounts will adopt these practices as the cost of water is a significant business expense for many.
- System water loss:
 - The framework needs to contain clear definitions on types of water loss, consistent with American Water Works Association M36, Water Audits and Loss Control Programs.

Water Shortage Contingency Plan

- Stages:
 - The first stage should be a voluntary stage. In San Diego County, we have successfully used a regional drought response plan that includes four levels through two separate droughts. Within this plan, Level 1, for example, implements voluntary measures and achieves water savings up to 10 percent. This is the “alert” stage that water agencies can use to notify customers that more stringent measures may become necessary in the immediate future.
 - Agencies should have the flexibility to define what actions are required under each level.

- Triggers:
 - Triggers should be directly tied to an individual water supplier’s available supply and demand. The executive order calls for drought resilience to be “customized according to local conditions.” The only way to accomplish that is to allow each agency to self-certify as each agency has a unique makeup of groundwater, local runoff, imported water, desalination, etc.
 - Any shortfall in supply would be the trigger that required an agency to invoke its water shortage contingency plan, which would then be reported to the state. This would also prevent an agency from being forced into a higher WSCP level than local conditions merit, as occurred last year. This would allow the state to focus on those agencies in need of their support and address the question of an appropriate baseline, as the water reduction would equal available supply instead of the state using an arbitrary year.

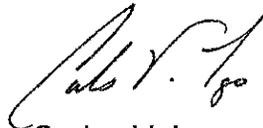
Again, we would like to express our appreciation to the Department of Water Resources and the State Water Resources Control Board for soliciting input from the water community and stakeholders. In a state as diverse as California, there is no one size fits all solution.

Working together, a balanced and thoughtful solution can be developed to ensure a sustainable water future for all the state.

Sincerely,



DeAna R. Verbeke
Board President
Helix Water District



Carlos V. Lugo
General Manager
Helix Water District