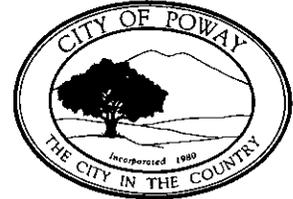


# CITY OF POWAY

DON HIGGINSON, Mayor  
JOHN MULLIN, Deputy Mayor  
JIM CUNNINGHAM, Councilmember  
DAVE GROSCHE, Councilmember  
STEVE VAUS, Councilmember



November 4, 2013

Peter Brostrom  
Water Use and Efficiency Branch  
Department of Water Resources  
State of California  
PO Box 942836  
Sacramento, CA 94236-001

*Sent via email to Peter.Brostrom@water.ca.gov*

Re: Independent Technical Panel – Demand Management Measure Updates

Dear Mr. Brostrom:

The City of Poway has been following the Independent Technical Panel (ITP) discussion on possible changes to the demand management measures (DMM) with great interest. We appreciate this opportunity to submit comments for consideration as the Panel further evaluates and finalizes recommendations at their meeting on November 5, 2013.

The ITP's evaluation of the DMMs presents a critical juncture. We respectfully request that the emphasis be on fine-tuning versus introducing additional analytical and reporting requirements that will be costly and time-consuming for our lean organization, and will yield no water savings.

The City of Poway is a medium-sized retail water agency that serves approximately 50,000 residents, with more than 13,000 service connections for residents and businesses. About 96% of Poway's water supply is raw water purchased from the San Diego County Water Authority, and 4% is recycled water for irrigation.

Our mission is to maintain a safe and reliable water supply and system, as well as ensure fiscal responsibility for our ratepayers. The cost to purchase raw water has doubled in recent years, which has been a difficult adjustment for our community. Poway is a long-standing member of the California Urban Water Conservation Council (CUWCC) and has realized a 36% reduction in water use in recent years.

The merit and effectiveness of 20% by 2020 as established by SB X7-7 is that each agency can implement what works best for their community -- attaining the goal through a combination of rate structures, programs, public education, and incentive programs that work best for each agency's unique character. The City of Poway urges the ITP to focus its efforts on the DMMs in a way that is in keeping with the spirit of the legislation allowing agencies the latitude to create an effective, customized plan for their customer base.

Peter Brostrom  
California Department of Water Resources  
November 4, 2013

Specifically, we note the following concerns with the proposals being considered at this time:

- ***Department of Water Resources (DWR) to Review Urban Water Management Plans (UWMP) to Ensure Water Use Projections Account for Estimated Savings from Adopted Codes/Standards/Ordinances/Land Use Plans***  
This change is unnecessary since over time, the water savings from these measures will manifest themselves in the gallons per capita per day (GPCD) calculation. Even with guidelines from DWR, calculating these estimates would be burdensome and yield no new water savings. Preparing the required guidelines and additional review would also require DWR staff time, which is already limited.
- ***DWR Review of UWMPs to Ensure Data Provided by Water Agencies is Complete and Valid***  
This proposal results in no new direct water savings and also requires already limited DWR staff time.
- ***Landscape Ordinance Summaries within Service Area***  
This change mandates a new analytical report for inclusion in the UWMP document. It will not be useful, nor will it save water.
- ***Calculation and Display of Energy Intensity for Urban Water Deliveries***  
Calculating energy intensity would be a tremendous burden, yielding no water savings. Every agency's water supply and delivery situation is different making it impossible to meaningfully analyze the data.

The City of Poway supports the proposed recommendation to simplify the reporting requirements. If agencies are on track to achieve their 2015 and 2020 targets, they should be considered to be meeting the SB X7-7 requirements. A simple narrative explanation would document what is working without adding burdens that divert agency resources to more report generation and, thus, detract from an agency's ability to successfully implement water efficiency measures. These narratives would also provide opportunities for stakeholders to identify effective, transferrable strategies for achieving water use targets.

Thank you for this opportunity to comment. We appreciate you sharing our comments with the ITP prior to their meeting on November 5, 2013.

Sincerely,

  
Leah Browder  
Director of Public Works