



December 22, 2014

(12/17/14) Public Workshop
Urban Water Conservation
Deadline: 12/17/14 by 12:00 noon

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



RE: Comment Letter – Urban Water Conservation Workshop

Dear Ms. Townsend,

In response to the State Water Resources Control Board's (SWRCB) requests for comments regarding public input on a range of actions the SWRCB should consider to compel further urban water savings, Sacramento Suburban Water District (District) respectfully submits the following comments.

In response to question one (1): What more should be done at the local and/or State level in the near-term to increase water conservation?

The District feels that the SWRCB should consider increasing funding to *Save Our Water!* The State needs to consider taking the leadership role in public education and implement a strong statewide campaign that supports regional and local campaigns that promote water use efficiency. These efforts should include local media buys via radio, television, and social media. The District also suggests that the SWRCB set an example by ensuring their own state managed properties are reducing their water use by the requested 20%. The State can show their leadership in water conservation by highlighting the installation of water efficient fixtures, reducing the amount of non-used turf, and sprinkler system upgrades via the previously mentioned media outlets.

In response to question two (2): What additional conservation requirements, if any, should the SWRCB consider adopting if dry conditions persist in the New Year?

The District found great water conservation success in communicating water use efficiency activities to its customers. The District increased its outreach messaging by sending out monthly and quarterly bill inserts/newsletters to customers regarding watering restrictions, an indoor and outdoor water conservation action checklist, what a 20% reduction in water use looks likely, landscape irrigation water use efficiency practices, a listing of low-water use plants, examples for customers about how to read their water bill and how to compare their water use from 2013 year to 2014, suggested outdoor watering schedules, a pledge campaign asking customers to take a pledge to reduce their water use by 20%, how to care for trees during a drought, a guide on replacing turf with native landscaping, information regarding soils and how they respond to irrigation, information regarding mulching, how to save water during the holidays, and how to winterize their homes to prevent leaks during cold weather months. The District also provided

window clings to restaurants informing customers that water would only be served upon request, maintained an updated website with the most current information regarding the drought, offered complementary Water-Wise House Calls to show customers how and where they can use water more efficiently. District staff was made available for guest presentations for large home owner associations and community groups to engage participants about drought conditions and to inform them about how they can save more water in and around their homes. The District has also leveraged grant funding opportunities to offer financial incentives to customers who are willing to upgrade their irrigation system (via Proposition 84 funds), and providing direct installation of indoor water fixtures (toilets, showerheads, and faucet aerators) to disadvantaged communities (via Prop 84 and Cal Fed). To further engage the community, the District participated in 4 large public outreach events contacting over 2,000 customers and distributing indoor and outdoor water use efficiency products and literature regarding the efficient use of water. The District also maintains two (2) WEL gardens (totaling 7 acres) where customers can visit to view examples of water efficient landscapes.

Should the drought continue, we advocate additional leadership by the SWRCB in providing enhanced statewide conservation messaging, providing additional funding to local conservation efforts, and providing additional support to local efforts tailored to local conditions.

In response to question three (3): What can be done to compel poorer performing areas to increase conservation?

The District would like to reiterate that the SWRCB should consider taking a leadership role in public education and increase funding for the *Save Our Water!* campaign. The SWRCB can assist all of California's water agencies by aggressively implementing a public education campaign that highlights how outdoor water use efficiency saves water and helps protect the environment and the positive impacts of indoor & outdoor water use efficiency.

In response to question four (4): What additional data should the SWRCB be collecting and how would it be used?

The District highly recommends that the SWRCB consider utilizing annual Residential Gallons Per Capita per Day (R-GPCD) instead of monthly R-GPCD which has limited use to measure and track efficiency and conservation efforts because of its variability between months. Monthly R-GPCD/GPCD can easily be taken out of context and promotes comparing water agencies to one another when they both may differ regarding climate zones, customer classes, and water supply impacts. The District suggests if R-GPCD or GPCD reporting continues the, SWRCB should align with the Department of Water Resources' 20x2020 GPCD reporting standard. The District feels that aligning with the Department of Water Resources' GPCD reporting standard will reduce media and customer confusion in regards to tracking water conservation reduction goals. The District believes that a standardized GPCD reporting method would be more productive.

In addition to the comments above, the District would like to express its appreciation of the SWRCB's current support of local regulations, as opposed to generating a statewide standard for

water conservation practices and restrictions. Local agencies are challenged to effectively communicate their programs to their customer base. Enacting a statewide standard would only perpetuate the communication challenges water agencies are already experiencing, and would ignore important local issues that are important to achieving conservation goals.

Respectfully,

A handwritten signature in blue ink, appearing to read "Robert S. Roscoe".

Robert S. Roscoe, P.E.
General Manager