



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager



July 14, 2014

State Water Resource Control Board
1001 I Street
Sacramento, CA 95814

Dear State Water Resource Control Board members:

RE: Proposed Emergency Water Conservation Regulations

Thank you for the opportunity to comment on your Proposed Emergency Water Conservation Regulations. The Metropolitan Water District of Southern California (Metropolitan) supports SWRCB's proposal to call on all Californians to increase water conservation, while granting control and flexibility to local water agencies to implement the most effective and efficient way to achieve that goal.

Metropolitan's service area has been a statewide leader in efforts to reduce per capita consumption through the implementation of conservation programs and development of resources within our region. These efforts resulted in a reduction of approximately 25% in potable per capita water use from the 1987-1991 drought up to the beginning of this current severe dry period. Metropolitan and its member agencies continue to focus on greater levels of water use efficiency with recent changes to our conservation programs to promote outdoor water savings, including a doubling of our conservation budget and an investment in the largest media-outreach campaign in Metropolitan's history. Again, these efforts are working as participation in our financial incentives for conservation devices, recycled water improvements, and turf removal have increased by more than 50% and are continuing to rise.

While supportive of the SWRCB's proposal Metropolitan, as a supplemental water wholesaler, requests a few clarifications and modifications to the Proposed Emergency Water Conservation Regulations that would allow us to work with our member agencies to achieve increased water conservation in this time of severe drought. Some specific suggestions are:

1. Sec. X.2 (b) and (c) state that each urban water supplier shall implement the stage of its water shortage contingency plan that imposes mandatory restrictions on outdoor irrigation. However, unlike retail water suppliers, wholesale water suppliers' water shortage contingency plans do not necessarily target specific types of water uses, whether indoor or outdoor. Therefore, we suggest that SWRCB clarify that only retail urban water suppliers should implement Sec.X.2 (b) and (c), and add the following subsection for wholesale water suppliers:

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“Each wholesale urban water supplier should enact policies and implement actions to assist and require retail water suppliers in its service area to implement Sec X.2 (b) and (c).”

2. Sec.X.2 (d) requires each urban water supplier to report an estimate of the gallons of water use per person per day used by the persons it serves. The quantity of water production or deliveries by wholesale water suppliers does not necessarily correspond with the consumptive use of end users. Wholesale water production is affected by many factors. For example, loss of local water supplies for a retail water supplier may lead to higher purchases from wholesalers even as the total consumption by the customers is decreasing due to water conservation. We request that Sec.X.2 (d) be clarified so that it applies only to retail urban water suppliers.

Specific suggestions to changes to the Proposed Emergency Regulations are in Attachment 1.

As the SWRCB collects water production data from wholesale water suppliers, this information should not be added to the production data from retail water suppliers to avoid double counting of water use. Wholesale water delivery data also should not be used for estimation of water use reductions as compared to 2013 usage levels.

Metropolitan appreciates that the SWRCB provided opportunities for water agencies to give input into the Proposed Emergency Regulations. Metropolitan is ready to assist the SWRCB, if desired, to develop the reporting format or technical analysis of the collected data. If you have any questions or need clarification regarding our comments, please contact my staff, Deven Upadhyay at (213) 217-6686 or via email at: dupadhyay@mwdh2o.com.

Very truly yours,



Jeff Kightlinger
General Manager

JK:rr

Attachment 1

Specific suggestions to changes to the Proposed Emergency Regulations

Attachment 1

Sec. X.2 Mandatory Actions by Water Suppliers

(a) The term “urban water supplier,” when used in this section, refers to a supplier that meets the definition set forth in Water Code section 10617.

(b) To promote water conservation, each retail urban water supplier shall implement all requirements and actions of the stage of its water shortage contingency plan that imposes mandatory restrictions on outdoor irrigation.

(c) To promote water conservation, each retail urban water supplier that does not have a water shortage contingency plan or has been notified by the Department of Water Resources that its water shortage contingency plan does not meet the requirements of Water Code section 10632 shall, within thirty (30) days, limit outdoor irrigation by the persons it serves to no more than two days per week or shall implement another mandatory conservation measure or measures intended to achieve a comparable reduction in water consumption by the persons it serves relative to the amount consumed in 2013.

(d) Each wholesale urban water supplier should enact policies and implement actions to assist and require retail water suppliers in its service area to implement Sec X.2 (b) and (c).

~~(d)~~ In furtherance of the promotion of water conservation each urban water supplier shall prepare and submit to the State Water Resources Control Board by the 15th of each month a monitoring report on forms provided by the Board. The monitoring report shall include the amount of potable water the urban water supplier produced, including treated water provided by a wholesaler, in the preceding calendar month. The monitoring report for retail urban water suppliers shall also estimate the gallons of water per person per day used by the persons it serves. In its initial monitoring report, each urban water supplier shall state the number of persons it serves.

~~(e)~~ To promote water conservation, each distributor of a public water supply, as defined in Water Code section 350, that is not an urban water supplier shall, within thirty (30) days, take one or more of the following actions:

- (1) Limit outdoor irrigation by the persons it serves to no more than two days per week; or
- (2) Implement another mandatory conservation measure or measures intended to achieve a comparable reduction in water consumption by the persons it serves relative to the amount consumed in 2013.

Authority: Wat. Code, § 1058.5.

References: Wat. Code, §§ 102, 104, 105; 350; 10617; 10632.