



Clerk of the Board
State Water Resources Control Board

Thank you for allowing the City of San Diego (City) the opportunity to provide comments on the proposed additional requirements, and mandatory actions related to the drought emergency response regulations. The City also appreciates the conference call last Thursday that announced these proposed new requirements, and the ability to provide comments during the call.

The City is committed at all levels to making water conservation and water use efficiency a part of our citizens daily lives. Our programs, educational outreach and services have helped San Diegans make better, more informed choices about how they use water and build a strong conservation ethic. The permanent, mandatory restrictions in effect since 2009 have successfully reduced consumption levels by an average of 18% from 2007 consumption levels. San Diegans have conscientiously reduced their indoor and outdoor water use, and with the help of the smart phone app "Waste No Water," they have been able to report observed water waste on a regular basis.

The City is supportive of the proposed additional end user requirements, as well as the new water supplier mandatory actions and reporting requirements. All of these requirements are already part of the City's permanent, mandatory water use restrictions in effect for the past six years (SDMC § 67.3803(b),(h),(i); § 67.3805(b)(7); § 67.3806(b)(1),(2)). The City is currently restricting irrigation to three days per week and no more than seven minutes per watering station, which complies with the new directive. The only change the City will initiate to clarify compliance with the new requirements is to administratively redefine our "rain event" to include 48 hours after measureable rain. Currently, the City prohibits irrigation during a rain event and it announces how many days to keep sprinklers off depending on the amount of rain forecasted (§ 67.05(b)(7)).

The City is proud of having implemented significant water conservation measures since becoming an original signatory to the Memorandum of Understanding Regarding Urban Water Conservation in 1991. We continue our commitment to challenge San Diegans to conserve more, and be leaders in conservation measures. As such, the City is able to maintain a residential gallons-per-capita consumption at just less than 70 gallons per person per day average in Calendar Year 2014.

The City looks forward to continuing to work cooperatively with the State Water Resources Control Board in helping minimize drought impacts.

Halla Razak
Director of Public Utilities
City of San Diego



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