



San Francisco
Water Power Sewer
 Operator of the Hetch Hetchy Regional Water System

(3/17-18/15) Board Meeting- Item 7
Urban Water Emergency Regs
Deadline: 3/16/15 by 12:00 noon
 525 Golden Gate Avenue, 13th Floor
 San Francisco, CA 94102
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March 12, 2015

Via Electronic and U.S. Mail

Jeanine Townsend
 Clerk to the Board
 State Water Resources Control Board
 P.O. Box 100
 Sacramento, CA 95814-0100
commentletters@waterboards.ca.gov



Dear Ms. Townsend:

The San Francisco Public Utilities Commission (SFPUC), operator of the Hetch Hetchy Regional Water System, submits the following comments on Agenda Item 7 on the State Water Resource Control Board’s March 17-18, 2015 Agenda, regarding “Consideration of a proposed Resolution for amending and readopting drought-related emergency regulations for urban water conservation.” The SFPUC supports the proposed regulations and the State Water Board’s continuing efforts to promote water conservation and accountability during this severe drought. We support the flexibility that Section 865(b)(2) of the proposed regulations would give to urban water suppliers to impose outdoor irrigation limitations and hope that the State Water Board maintains that flexibility, as further outlined below.

Even before the onset of the current drought, San Francisco had one of the lowest per capita water use in the State thanks to the successful implementation of water conservation over several decades. The longevity of conservation in San Francisco has also resulted in hardening of indoor demands. Since the State Water Board’s initial emergency regulations went into effect in July 2014, the SFPUC’s retail customers have achieved an 8% reduction in gross water use, or 6% in residential, as compared to the same period of the prior year. We believe these reductions are substantial given how difficult it is to reduce not just indoor water use, but also outdoor water use in a dense urban area with relatively low outdoor water use to begin with. Also during this period, residential water use has consistently been one of the lowest in the State, remaining at or below 46 gallons per capita per day.

In response to the State Water Board’s initial emergency regulations, the SFPUC launched a multi-lingual outdoor water waste education and enforcement program, resulting in review and action with hundreds of reported incidents. The SFPUC also implemented Stage 1 of its Retail Water Shortage

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Allocation Plan and approved a mandatory 10% water use reduction for irrigation customers that use potable water for the irrigation of outdoor landscapes or turf. The SFPUC established rules to assign water allocations to all irrigation accounts and to impose excess use charges. Monthly water allocations are set to 90% of water use during the corresponding month in 2013, and an excess use charge that is twice the normal water rate is charged for each unit of excess water used. This allocation process was adopted in August 2014 and went into effect in October 2014.

In addition to the SFPUC's efforts, the San Francisco Recreation and Parks Department, which is the largest outdoor water user in San Francisco, adopted operation protocols aimed at reducing departmental water use, including a 10% reduction in irrigation run time. The Recreation and Park Department manages two of the largest outdoor irrigation users in San Francisco, Harding Park Golf Course and Golden Gate Park, which are irrigated with recycled water and non-potable groundwater, respectively. The SFPUC has partnered and continues to partner with the Recreation and Parks Department to offset potable irrigation with non-potable irrigation.

One of the proposed amendments to the emergency regulations, Section 865(b)(2), would allow an urban water supplier that does not restrict outdoor irrigation to a prescribed number of days per week to request approval of an "alternate plan." The SFPUC supports the approach for including alternatives to the days-per-week restriction and encourages the State Water Board to allow for flexibility in meeting the requirements of the "alternate plan" so that communities can achieve greater levels of conservation through creative and resourceful solutions specific to their service areas. For example, in San Francisco, implementing the allocation process described above is likely to save more water than limiting outdoor irrigation to two days per week. We encourage the State Water Board to keep in mind that outdoor water use habits and urban water supplier management practices vary across the State, and this variability should be considered if the drought-related emergency regulations are to be amended.

We appreciate the opportunity to provide these comments and sincerely thank the State Water Board for its efforts.

Yours truly,



Steven R. Ritchie
Assistant General Manager, Water

cc: Bay Area Water Supply and Conservation Agency
California Urban Water Agencies