City of Anaheim
PUBLIC UTILITIES DEPARTMENT

April 13, 2015

Ms. Jessica Bean
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
Jessica.bean@waterboards.ca.gov

Subject: Comments on Regulatory Concepts to Implement the Governor’s April 1, 2015 Executive Order

The City of Anaheim Public Utilities Department (Department) appreciates the opportunity to provide input to the State Water Resources Control Board (State Board) on implementation of the Governor’s Executive Order B-29-15. We recognize the State Board’s action need to be expedited to respond to the drought before the summer season. We must collectively act now to address our current state of water supply emergency due to the intensifying drought conditions impacting California residents and businesses.

We have reviewed the draft framework and Governor’s Executive orders and understand the goal to reduce statewide water demand by 25% by focusing on outdoor water usage. We support the comments prepared by the California Municipal Utilities Association. In addition, the Department has the following comments on the draft framework:

1. Credit for Indirect Potable Reuse – The Department along with our neighboring agencies have invested in the Groundwater Replenishment System over the past 5 years. The recycled water is indirectly used in our potable water systems and should not account for our total water production. This would be consistent with the Governor’s previous call to reduce potable water demand 20% by 2020.

2. Growth in Customer Base – The City of Anaheim hosts over 20 million visitors throughout the year in our resort areas. With the recovery from the recession, the City of Anaheim has seen a significant increase in tourism and redevelopment that will increase our total water demand from the baseline year. We would like to recommend that the State Board develop methodologies to adjust for this type of growth and transient nature of water use.
3. Public Outreach – The State Board should implement a public outreach campaign to get the message of conservation to the residents. The Department will continue its local outreach campaign, including public service announcements, social media, utility bill inserts, and local publications (enclosed); however, a statewide media campaign would be effective in reaching more residents with a consistent message.

4. Use of Fines to Further Conserve – While the Department has no plans to incur any fines, we would like to recommend that if an agency is fined, that 75% of the amount of the fine be returned to the community to assist with the development and implementation of additional conservation and efficiency measures in order to help the community meet their water reduction requirements.

5. Revise CII Reporting Requirements – Agencies should be allowed to report total usage for the commercial, industrial and institutional sector, rather than separated out by customer type. Agencies are not always able to accurately separate out these customers and depending on the number of large accounts may unintentionally violate customer confidentiality requirements of the Public Records Act. An overall CII usage amount provided monthly will still achieve the State Board’s goal, which is to reduce water use in that sector.

We appreciate your consideration of these revisions. Please call me if you have any questions at (714) 765-5173.

Respectfully,

Dukku Lee, PE
Public Utilities General Manager

Enclosure

c: Anaheim Public Utilities Board
Committed to Conservation

Longtime Anaheim home owners, Carlos and Esthela Ayala have transformed their front yard which will help them conserve water for many years to come.
anaheim
is doing our part
during the
drought
If you've lived in California for any length of time, you know that droughts aren't isolated events—the last one took place in 2007-2009. Unfortunately, the state's current drought, now entering its fourth year, has been hailed to be one of the worst droughts in the past century. Extremely low levels of snow and rainfall have resulted in water shortages and mandatory water use restrictions. Living in drought conditions is becoming the new normal, and Anaheim has been doing its part as September 2014 resulted in a 9 percent reduction in residential water use (gallons per person per day) from the prior year.

"By making simple changes in our everyday water-use habits, such as taking shorter showers and washing only full loads of laundry, saving water is becoming a regular part of the California lifestyle," said Don Calkins, Anaheim Public Utilities Assistant General Manager-Water Services and Metropolitan Water District of Southern California Board Member. "However, we need to do more, and we can by looking at our outdoor watering, where average households use about half of their water. We're encouraging all our customers to cut back on their watering schedules, especially as the weather cools down during fall and winter months."

To encourage customers to take action, Anaheim Public Utilities offers a number of outdoor landscape incentives. Rebates are offered for rotating nozzles, advanced irrigation controllers, and even rain barrels. One of the most popular programs has been the turf removal program, which saw a dramatic spike in participants this year as a result of a rebate increase, thanks to a state grant.

"By making simple changes in our everyday water-use habits... saving water is becoming a regular part of the California lifestyle."
We realized that the drought was only getting worse, and the part of our home that required the most water was keeping the grass green.

Replacing lawns with low-water-use landscaping not only adds beauty and variety to a yard, but can also save homeowners tens of thousands of gallons of water each year.
Motivated to save water, longtime Anaheim residents Carlos and Esthela Ayala removed more than 2,000 sq. ft. of grass in their front yard and replaced it with low-water-use landscaping. Their investment is expected to save more than 50,000 gallons of water each year.

“We realized that the drought was only getting worse, and the part of our home that required the most water was keeping the grass green,” says Ayala.

Over 29 acres (or 1 million square feet) of non-essential play areas at the Anaheim Hills Golf Course is being replaced with native vegetation, eliminating around one fourth of their turf. This will result in significant water savings of 35 million gallons each year.

“When we heard the City was offering rebates to remove grass, we immediately called to find out how we could participate.”

Not only are residents and businesses doing their part, the City is also taking major steps to reduce its water use with its own operations and public facilities. At the utility’s largest electric substation, for example, nearly 14,000 sq. ft. of grass is being replaced with drought tolerant plants and mulch to significantly cut water use.

Over at Anaheim Hills Golf Course, 29 acres (or 1 million square feet) of non-essential play areas is being replaced with native vegetation, eliminating around one fourth of their turf. The golf course is slated to receive a rebate through the Metropolitan Water District and Anaheim Public Utilities that will fully fund the project and result in significant water savings of 35 million gallons each year.

Updating to a more efficient irrigation system can also make a big impact in saving water. The City is taking advantage of grants to help fund irrigation improvements at Dad Miller Golf Course. Anaheim Public Utilities estimates that the collective savings from residents, businesses, and city facilities total 3 billion gallons of water every year—enough water to provide for 25,000 Anaheim homes. These long lasting changes in how we all use water more efficiently will help all of Anaheim manage through the current drought and prepare for the future.

To learn more about the many incentives and rebate programs for residents and businesses to save water and money, visit www.anaheim.net/savewater.
LET'S DO OUR PART

SAVE WATER

LEARN MORE AT ANAHEIM.NET/SAVEWATER