

SWRCB Staff Regulatory Concept Comments

The City of Daly City appreciates the opportunity to comment on the regulatory concepts under consideration by the State Water Resources Control Board staff to implement Governor Brown’s call for all California residents to conserve 25% of their water use in response to our fourth year of unprecedented drought. Daly City understands the inherent challenges when seeking a unified approach among 411 affected urban water agencies. Any proposed approach must be transparently understood by the State Board, affected local agency, and, most importantly, local agency residents who will ultimately bear the burden on the decisions now under consideration. The regulatory concept reliant on Residential per Capita Demand (R-GPCD) is not taken lightly, making it critically imperative that the numbers used are rigorously calculated and accurately documented.

Daly City’s initial determination as a Tier 1, 10% cutback agency comes as the result of its September 2014 R-GPCD of 55.6. Subsequent information received continues to note Daly City as a Tier 1, 10% cutback agency, but Daly City has been informed by others that due to its 55.6 R-GPCD, 0.6 gallons above the 55 R-GPCD threshold, that Daly City will be moved to a Tier 2, 20% cutback agency. While disappointing to learn that three-fifths of a gallon distinction could potentially double Daly City’s conservation requirement and having the knowledge that numbers matter, it is critical to ensure the numbers are in fact accurate as public policy ramifications are significant.

For Daly City’s September 2014 R-GPCD, numbers were re-submitted on December 3, 2014 showing 43.5 R-GPCD. Moreover, when re-applying the State Board’s R-GPCD Calculation Method Daly City’s calculation is 51.24 R-GPCD. This distinction is critically important not only because these numbers are below the 55 R-GPCD Tier 1 threshold, but notes how the numbers are calculated and documented bear equal importance in working with State Board staff toward implementing achievable local water conservation goals.

Daly City’s water use results from a densely populated bedroom community with the highest population in San Mateo County of 105,076 (per Department of Finance) residents living in 7.6 square miles. Daly City’s current 22,733 metered accounts are broken down as follows:

Single Family Homes	18,780 (82.61%)
Multi-Family	2,887 (12.70%)
Commercial/Institutional	707 (3.11%)
Industrial	5 (0.02%)
Irrigation	254 (1.12%)
Other	100 (0.44%)

Coupled with the following bi-monthly breakdown of use:

0 to 20 ccf	35.2%
21 to 50 ccf	23.5%
50 plus ccf	41.3%

It is understood that much of the expected statewide urban water use savings are aimed at outdoor irrigation. Such savings will not be realized in Daly City as it is readily apparent local residential water use is primarily basic human health and sanitation indoor usage. State Board staff should be aware

there is little distinction in Daly City between winter months and slightly higher summer months usage. Pre-drought declaration 2013 baseline water use numbers bolster this point. January/February 2013 use accounted for 420,960,708 gallons; July/August (highest use numbers) accounted for 432,863,948 gallons, an increase of only 2.8%

When proposing a tiered water conservation approach, it is critical that the numbers used accurately reflect a consistent and recognized calculation approach. In Daly City's case, these numbers make a big difference.

Thank you in advance for your attention and consideration of Daly City's staff comments to the State Board's regulatory concepts. I am available to answer any questions or provide additional information for your consideration.

Respectfully submitted,

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