

Ms. Bean,

1. So far the State Emergency Water Restrictions and revisions **do NOT explicitly include the municipal sector**. Municipal sector along with residential and CII should share the burden of water demand restrictions.
2. AB2403 passed July 2014 defines recycled water as water. The Emergency Water Restrictions **do NOT explicitly address restrictions to recycled water use**.
3. The State Water Resources Control Board's 1998 Revenue Guidelines regarding water allocation for prisons infers high water use often interpreted as high as 175 gallons per prisoner per day; similarly, wastewater from prison at about 140 gallons per prisoner per day. The Board should **explicitly establish emergency reductions in per-prisoner water consumption** and permanently reduce high per-prisoner daily water use in non-emergency conditions.

Case example.

Incorporated city with population of 13,000 (of which 2,400 are state prisoners). Two gas stations, two stop lights. The municipal use of water is 35% (or 1,500 AF/year) mostly water main leaks, landscaped parks, and two fully landscaped but under-utilized 18-hole golf courses irrigated with mostly potable water. One course is fully irrigated with potable water and the other course has tees & greens irrigated with potable water and fairway-only irrigated with recycled water. the golf course does not pay for its recycled water use.

**Water main leaks average close to 1 million gallons per day, over the past two decades.** Recall the UCLA water main leak last year at 10 million gallons. An equivalent amount of water leaks occur every week of every summer of every year in the incorporated city discussed here, no news coverage.

This case study city manages all water pumping and distribution (no water district) and sewer services and the city has NOT paid for municipal water use as required by Prop 218 from 1997 until November 2014. Residential use is only 35% and CII use is 30% while again, municipal use is 35%.

Consider adding the following concept to State Emergency Restrictions. High municipal water pressure increases water use and water leak potential. Municipal water pressure can be as high as 130 psi without water customers knowledge. **Water districts and municipalities should be responsible for notifying customers that their water main pressure exceeds the national plumbing standard maximums (e.g., 75 psi for residences).** Solution is installation of water pressure reducers (a.k.a. water pressure regulators) to reduce residential water pressure entering the property. **Requiring water providers to notify customers of high water main pressure is very easy to accomplish.** Water providers know their water main pressures. Substantial water consumption reductions are feasible with water pressure reducers where water main pressures are too high.

Summary,

Please explicitly add the following to emergency water restrictions:

1. Municipal Sector
2. Recycled Water

3. Reduce per prisoner water allocation specified in State Water Board Guidelines.
4. Water providers notify customers where water main pressures exceed 75 PSI, recommending pressure reducers to reduce water consumption.

DJM