



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

Office of the General Manager

April 22, 2015

Ms. Felicia Marcus
Board Chair
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Dear State Water Resources Control Board members:

RE: Draft Emergency Regulation for Urban Water Conservation

Thank you for the opportunity to comment on your Draft Emergency Regulation for Urban Water Conservation released on April 18. The Metropolitan Water District of Southern California (Metropolitan) supports the Governor's call for a mandatory 25 percent statewide urban water use reduction and is committed to helping the state to obtain the necessary water use reductions.

Metropolitan also appreciates the State Water Resources Control Board for making modifications to the earlier proposed regulatory framework addressing some of our comments and concerns. We understand the challenge of allocating the water use reduction in an easy to understand way and requiring areas with higher per capita water use to achieve proportionally greater reductions. Metropolitan urges the SWRCB to consider a few other factors into your final regulation that would improve the equity of the allocation methodology:

1. ***Adjust for Climate*** – understanding that per capita water use is influenced by climate, especially temperature; a water supplier reduction percentage could be adjusted by an outdoor irrigation factor based on their location within climate zones. The climate zones can be determined by readily available evapotranspiration data.
2. ***Adjust for Progress towards 20 by 2020 Targets*** – Water agencies have been making progress towards meeting their 20 by 2020 long term water use efficiency targets. Metropolitan and its member agencies have been investing in water use efficiency long before the comparison year of 2013. An adjustment factor could be added to recognize these long term efforts in addition to recent savings to further modify the reductions required of water suppliers.
3. ***Adjust for Population Density*** – Certain water agencies serve areas with lower population densities and therefore, have a higher per capita water use. In most cases, these water agencies do not determine the land use in their service area. While water agencies in the future should work closer with land use agencies to improve water use

State Water Resources Control Board members

Page 2

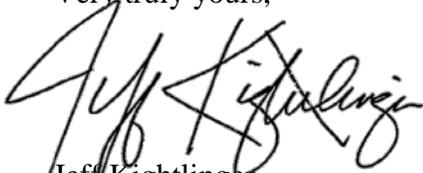
April 22, 2015

efficiency, these changes will take time. Water agencies should not be penalized for the land use characteristics in their service areas.

4. ***Adjust for Critical Commercial and Industrial Water Uses*** – Many commercial and industrial processes require a critical amount of water supplies. While water utilities will continue to work with these businesses to gain efficiencies in the use of energy and water, the opportunities to reduce water use may be limited due to the requirements of manufacturing and industrial processes. It is important to recognize the importance of maintaining employment and economic development generated from the commercial and industrial sectors. Consideration for water agencies with service areas that have a high amount of commercial and industrial businesses should be made.

Thank you for considering our comments. If you have any questions or need clarification regarding our comments, please contact my staff, Deven Upadhyay at (213) 217-6686 or via email at: dupadhyay@mwdh2o.com.

Very truly yours,



Jeff Kightlinger
General Manager

JK:rr