



December 16, 2014

Attn: Clerk of the Board
commentletters@waterboards.ca.gov

RE: "Comment Letter – Urban Water Conservation Workshop."

The Green LA Water Committee would like to submit the following comments regarding additional actions that the State Water Board might consider if drought conditions persist.

1) What more should be done at the local and/or State level in the near-term to increase water conservation?

- a) Establish a residential statewide gallons per capita per day goal—not as a result of drought but as a new policy aimed at shaping a resilient California. The goal should be aggressive enough to build water security throughout the state reflective of the "21st century normal."
- b) Emergency declarations and emergency measures do not help shift practices for the long-term. We recommend a reframing of State Water Board efforts at conservation from the current emergency drought response to a more long-term water literacy. This transition can be reflected in Board orders, and in outreach, education and media messages.
- c) School grounds remain a strong opportunity for water literacy and conservation. Though DROPS is a significant investment that we commend the State Board for undertaking, we recommend that the Board engage directly with Department of Education to assure that teachers and curricula are developing water literacy in all California students, and that all School Districts are encouraged to plan for and take action to retrofit campuses for water conservation, stormwater management, and climate adaptive goals.
- d) Launch a coordinated, state-supported public campaign encouraging water conservation and providing frequent progress updates on community water consumption.

2) What additional requirements if any, should the State Water Board consider adopting if dry conditions persist into the new year?

- a) The Board should lead the way statewide in thinking and acting holistically and regionally about water, including groundwater, stormwater, recycled water, and water infrastructure. The Board should encourage regional and local water self-sufficiency.
- b) Update and streamline state building codes to encourage parcel-based stormwater management. State codes are currently designed to encourage moving water offsite

quickly and many are overly conservative and restrictive of onsite stormwater management goals.

- c) Request early access to draft NRCS soil data for Los Angeles region.
- d) Update and streamline codes relative to greywater and rainwater for non-potable and direct potable reuse.
- e) Recognizing the importance of water pricing in influencing customer behavior, request rate design information from urban water suppliers. Promote the statewide adoption of rate structures designed to encourage conservation, including increasing block rates and seasonal rates.

3) What can be done to compel poorer performing areas to increase conservation?

- a) Set statewide gallons per capita per day goals, and highlight communities that are succeeding in or failing to meet those goals.
- b) Limit the use of potable water for landscapes and incentivize outdoor metering.
- c) Poorer performing areas tend to be more affluent communities with higher functioning school districts. These school districts therefore have more capacity to advance innovative projects with the accompanying educational resources or partner with city agencies. Higher capacity school districts can be compelled to meet conservation targets and manage their stormwater onsite. The Board may tie these projects to educational programs to build a generation committed to wise water stewardship. Similarly, affluent communities can be compelled to make adjustments to water use and management on public lands.

4) What additional data should the State Water Board be collecting and how would it be used?

- a) The monthly agencies' report out on water use has proven to be a good first step to help understand how water is used in a specific region. In addition, agencies should also report:
 - i) the amount of imported water and the GHG emissions associated with imports.
 - ii) the percentage of the total water that is locally sourced.
 - iii) the volumes of fresh water discharged into receiving water bodies.
 - iv) each water agency's rate design
 - v) annual reports on which communities are making the most progress with respect to conservation, associated GHG reductions, local water reliance, and stormwater management.
 - vi) This will give agencies, ratepayers and municipal leaders a clear understanding of what their region's available resources are, therefore becoming accountable for the policies that support unsustainable or inefficient practices.
- b) Examine standing policies like flushing lines into stormdrain systems, and instead move such water to other non-potable uses
- c) Track dewatering permits and phase them out. Restrict development that requires dewatering.

Sincerely,



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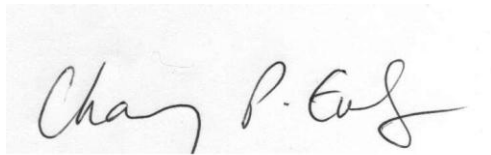


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