



December 16, 2014

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: Comment Letter – Urban Water Conservation Workshop

Dear Ms. Townsend:

The American Water Works Association (AWWA) represents the professional drinking water community, including both those that own and operate water utilities and those that provide products and services needed to do so. The California-Nevada Section of AWWA (Section) has nearly 5,000 members in California, who are involved in every aspect of providing safe and reliable water to the public. The Section's membership includes publicly owned water utilities as well as investor owned utilities (IOUs), mutual water companies, consulting engineers, laboratories and scientists, and equipment manufacturers and suppliers. The Section appreciates the opportunity to provide these comments on additional actions the State Water Board should consider to compel further urban water savings if drought conditions persist.

Our comments address the questions posed for the workshop:

1. What more can be done at the local and/or State level in the near-term to increase water conservation?
2. What additional conservation requirements, if any, should the State Water Board consider adopting if dry conditions persist into the new year?
3. What can be done to compel poorer performing areas to increase conservation?
4. What additional data should the State Water Board be collecting and how would it be used?

I. Make certification and continuing education a requirement for urban agencies' water conservation personnel.

Recommendation: The State Water Board should require continuing education and certification—both of which are readily available—for urban agencies' water conservation personnel.

Discussion: Urban Water Management Plans that include demand management measures (DMMs) and drought contingency action plans are required of California urban water suppliers with over 3,000 connections or delivering over 3,000 acre-feet per year. There is not a requirement however, for a demonstrated level of professional knowledge that would be assured by appropriate education and

certification. In contrast, water and wastewater system operators have this requirement, which state and federal regulators believe necessary to ensure that operators are well trained and have the knowledge to protect public health and the environment. In a drought emergency, public health and the environment can also be put in jeopardy by decisions of agency personnel lacking the level of knowledge that can be demonstrated by a relevant certification, backed by continuing education.

Just such education and certifications exist. From 2008, the Section has developed and currently offers certification of Water Use Efficiency Practitioners in three grades based on the appropriate range of knowledge for each occupational level. The required range of knowledge was developed by subject matter experts and the certification exams were validated by a psychometrician to ensure that the certification meets a high standard of occupational relevance and testing accuracy. In addition, the Section and others – including colleges and other organizations – provide education for water conservation professionals. Just as the State relies on certification and continuing education for to ensure public safety from water and wastewater system operators, the Water Board should consider a requirement that water conservation personnel obtain and maintain professional certification.

II. Collect and analyze data on the comparative success of urban agencies with and without certified water conservation personnel.

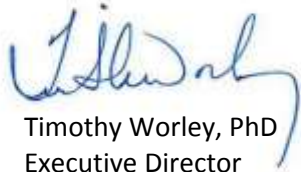
Recommendation: The State Water Board should collect data from all urban water agencies on their personnel holding the Section's Water Use Efficiency Practitioner certification, and conduct a statistical comparison of agencies with and without certified employees.

Discussion: The Water Boards already have data on the per capita water use over several months for urban water agencies. While there can be different variables (elected or employee leadership, local political culture, etc.) that affect the ultimate water savings results, it would be valuable for the Water Board staff to tease out the impact of certification and training on this equation. The statistical analysis would have to be carefully designed in order to separate causation from simple correlation, but if done successfully this would provide a basis for additional actions by the Water Board acting on its own or in coordination with the Section:

- a) Making certification and continuing education of water conservation personnel a requirement of urban water agencies (as recommended above); and/or
- b) Strengthening the existing certification and education regime to improve the impact in real, measurable water savings.

Thank you for the opportunity to share these recommendations with the Board. If you have any questions about them, or wish to obtain any additional information about the training and certification offered by the Section, please contact me at tworley@ca-nv-awwa.org or by phone, (909) 291-2102.

Sincerely,



Timothy Worley, PhD
Executive Director