



March 12, 2015



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The Honorable Felicia Marcus, Chair
and Members of the State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Subject: 3/17-18/15 Board Meeting – 7. Consideration of a proposed Resolution amending and readopting drought-related emergency regulations for urban water conservation

The Municipal Water District of Orange County appreciates this opportunity to provide input to the State Water Resources Control Board (State Board) on the proposed Resolution amending and readopting drought-related emergency regulations for urban water conservation due to persistent drought conditions impacting California. MWDOC provides the following comments for your consideration:

1. Mandatory restrictions on the number of days that outdoor irrigation is allowed –
 - a. Allow agencies to establish this requirement through ordinance, resolution, or other means, not only through Water Shortage Contingency Plan. This is especially important for agencies that do not have a days per week watering provision in their Water Shortage Contingency Plan or have other provisions in the level of their plan that does have a days per week that are more restrictive than necessary at this time. By allowing agencies to utilize an ordinance, resolution, or other means, outside of their Water Shortage Contingency Plans, these requirements could be established more quickly and provides more flexibility.
 - b. Agencies needing to update their water shortage contingency plans will require a minimum of 60 days to adopt an updated plan; which is well beyond the proposed 30 day compliance period. As a result, the State Board should consider a 60 day compliance timeframe.

2. Enforcement of Emergency Regulations – Based on the January 2015 reporting, eight percent of agencies did not report and, of those that did report, five percent do not have mandatory outdoor restrictions. The State Board should consider enforcement action for those agencies not complying with the Emergency Regulations.

3. Recognition of Indirect Potable Reuse (IPR) - IPR accounts for almost 20 percent of R-GPCD water use in northern Orange County. A credit for IPR should be incorporated into the R-GPCD calculation to recognize this progressive water resources management option and to promote broader use of IPR where feasible.
4. R-GPCD reporting should be weather normalized – Temperature and precipitation or evapotranspiration data should be used to weather normalize water use data for reporting purposes. A preliminary analysis of water use in Orange County shows a November water savings increase from 3 percent (not weather normalized) to 13 percent when weather normalized. US Climate Data or the California Irrigation Management Information System are well established, broadly accessible data sets that can be used for this analysis. Several weather normalization methodologies exist, including methods from the California Urban Water Conservation Council, American Water Works Association, and California Public Utilities Commission. It is our opinion that weather normalizing the R-GPCD reporting would make the reporting results more accurate and meaningful.
5. The State Board, Department of Water Resources (DWR), and the Governor should implement an enhanced, statewide public information campaign using existing outlets to discuss the need to conserve directly with the citizens of the state. We need to tell the residents the expectations now in the event we do not have a good precipitation year. Follow-up needs to occur each month when the snow survey is completed to keep residents informed. People are tired of being asked to conserve. Messages need to reinforce that we have no other options due to the drought we are in.
6. The State Board should assist agencies to develop water budgets or efficiency targets to establish a “Loop of Accountability” or the ability to perform an “efficiency checkup” with customers so that all customers are informed about what constitutes an efficient level of use. The “Loop” consists of direct feedback via water bills that share how much water customers are using compared to an “efficiency standard.” Monitoring actual water use compared to an efficiency standard will allow water agencies to easily identify and focus on customers using water in excess of their efficiency target.
7. The State Board should maintain the availability of the alternative compliance option for those agencies implementing budget-based tiered rates.

Again, we appreciate the opportunity to provide input as the State Board considers additional emergency regulations to respond to our water supply challenge. Should you have any questions regarding these comments, please contact me at (714) 593-5026.

Sincerely,



Robert J. Hunter

Cc: Larry D. Dick