

3152 Shad Court
Simi Valley, CA 93063
September 11, 2008

State Water Resources Control Board
Ms. Jeanine Townsend, Clerk to the Board
1001 I Street
Sacramento, CA 95814

Re: Development of an Urban Water Conservation Regulatory
Program--Notice of Workshop--Public Comments Letter.

Dear Members of the Board:

At first I was not going to address the aforementioned item since I was exhausted after undertaking the newly noticed Bays and Estuaries SQOs SWRCB public hearing. Then, I remembered: 1. that the City of Simi Valley City Council--acting as the Directors of the Ventura County Waterworks District No. 8--had approved joining the California Urban Water Conservation Council (CUWCC), and 2. that the County of Ventura Board of Supervisors had approved withdrawing from the Southern California Water Committee (SCWC) and instead join the Association of Water Agencies (AWA). And, after all, since 1996 I have addressed Urban Water Management Plan Updates for: 1. the City of Simi Ventura County Waterworks District No. 8, 2. Calleguas Municipal Water District (CMWD), and 3. Metropolitan Water District (MWD). So, I read through the "discussion paper" very carefully, and put down my thoughts, then I searched through City and County past agendas. The following are my comments, concerns, suggestions, and questions.

- #1 - The definition of "urban water supplier" must include wholesalers and retailers since an urban water management plan is required by the Water Code sections 10620-21 (2nd paragraph, Page 3).
- #2 - All urban water suppliers, including the smaller ones like Brandeis-Bardin, must be required to submit urban water management plans/updates if California is to be successful in responding to drought conditions currently and in the future with a "water use efficiency and conservation

approaches" (Page 1, last paragraph, first sentence) program/policy.

- #3 - I prefer the idea of "Some combination of" the "three alternatives" given on Page 3, fifth paragraph, last sentence.
- #4 - I prefer the idea of the Board mandating all of the California Urban Water Conservation Council (CUWCC)'s 14 Best Management Practices (BMPs) since the Bay-Delta Workplan's proposed actions included an assessment of a regulatory program.
- #5 - I am concerned that non-CUWCC members will be at a disadvantage because of the mandate under AB 1420--"members are given priority over non-member agencies in receiving funding from State Water Project Programs... Proposition 50... Proposition 84" and others--especially if there are disadvantaged urban water suppliers like there are disadvantaged communities. (April 7, 2008, City of Simi Valley City Council/WWD No. 8 Board of Directors Agenda Item 5(4))
- #6 - I am concerned that while the CUWCC's 14 BMPs may all be mandated, its "MOU signatories" who "agree to implement these measures" "are allowed exemptions under certain conditions or when they can demonstrate they have implemented alternative methods of compliance with the BMPs that would be equally effective." (Page 3, top paragraph)
- #7 - Allowing the exempted requirements under Comment #6 to CUWCC members is an unfair disadvantage to non-member urban water suppliers, and thus in certain cases, or all cases, to disadvantaged communities.
- #8 - A year or two ago, City staff went around my neighborhood changing the residential water meter covers--from concrete to something modern to better read them by GPS/GIS(?) to save man hours. The City employee said mine had to be special ordered since the cover is on the driveway. To date the cover has not been changed. The State Water Board must be assured that what an entity says is the God's honest truth. So does the

CUWCC have to have the God's honest truth from its members. I for one, unless I ask, will not know if my City/WWD No. 8 are pocketing--or as in the case of the City of Sacramento the equipment is being sold to a third party--the money in accounts because they are not following through.

- #9 - Water fountains of all kinds--recirculating and non-recirculating must be restricted. Otherwise, allowing recirculating water fountains shows there really is no cause for concern, or entities are not serious about conserving water. All types of water fountains water supply evaporates.
- #10 - The construction of swimming pools--residential and hotel/motel--must be curtailed if entities are serious about conserving water resources.
- #11 - With the statewide mortgage and foreclosure crisis, there is an abundant supply of housing. California must finally limit building in times of drought, otherwise there really is no serious desire to conserve the State's water resources.
- #12 - If the State, and local governments are not serious about the subjects under Comments #9, #10, and #11, then, "Translating water use efficiency savings into specific water supply reliability benefits will" not only "depend on the water system involved, the level of savings, and the variations in water savings from one year to the next and throughout the year", but guts as well(1st paragraph, Page 2)

SUGGESTIONS

- #1 - Page 4, BMP 1(Water Survey Programs for Single and Multi Family Residential Customers) and/or possibly BMP 2(Residential Plumbing Retrofit), take into consideration familial and non-familial (Hurricane Katrina type evacuations housing) household changes--increase in number of people due to divorce, health, death, etceteras that impact the use of water(increase).
- #2 - Page 4, BMP 7(Public Information Programs), in

the many types of brochures and handouts that I have gotten throughout the past 20 years on water use, I don't remember a single mention that specifically targets certain conservation measures to men and women. For adults there must be programs--planned along the same line as the programs to educate school children up to the high school ages--so that most especially men who love to wash their cars, hose down driveways, hose down lawn mowing equipment, etceteras will realize the waste of water resources, and the impacts to waterways. I don't think that the joy of nature has been emphasized with regards to hand/hose watering lawns either.

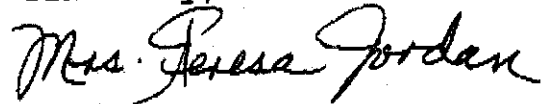
- #3 - Page 3, top paragraph, end of sentence, the "implemented alternative methods of compliance with the BMPs that would be equally effective" must be listed in the regulatory program.
- #4 - In 1996, the City of Simi Valley/WWD No. 8 Board of Directors approved the update of the Urban Water Management Plan in which it was stated that the Water Plan would be updated. It is now 2008 and there still is no adopted Water Plan Update. A monitoring plan must be in place to assure that entities who say such things do follow through ASAP. If not there must be enforcement and penalties regulations set in place if they are not already done.
- #5 - While urban water suppliers have conservation measures in place to implement in times of drought, the phasing is not set in such a way as to implement the conservation measures by residents and businesses immediately. With this current drought, MWD, Calleguas MWD, and City of Simi Valley Ventura County WWD No. 8 have waited until the need to conserve water has become dire. This is being done even though "The California Water Plan Update 2005 identified urban water conservation as one of the key water resources management strategies with the most potential for meeting the state's future water demands." (3rd paragraph, Page 2) I feel the lateness of MWD's disproportionate drought conservation measures phasing was done by MWD in order to have its plan

that rewards the bigger water using communities and punishes those communities which helped to finance the system in the first place approved.

QUESTIONS

1. Did the voiding of the November 19, 2007, February 5, 2008, and February 19, 2008 public hearings testimony, and Exhibits on the SQOs for Bays and Estuaries impact the Strategic Workplan for Activities in the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Workplan)? Is this why an evidentiary hearing is scheduled?
2. My City discontinued the position of Conservation Coordinator for a number of years, I believe, due more to the cost than that the drought was over. The City always finds money to do almost everything in its list of incentives for business, and waiver of regulations. Yet, this position's duties can easily be carried out by any filled staff position. Are there grants that disadvantaged communities/urban water suppliers can apply for in order to have in place a Conservation Coordinator? Or are the grants all encompassing? (Page 4, BMP 12)
3. My City only meets 13 of the BMPs, but has joined the CUWCC. To my recollection, I don't believe that an alternative method of compliance with the 14th BMP was suggested--sorry no time to cross-reference its current Urban Water Management Plan Plan Update. How can it then qualify for CUWCC membership? Are there other entities in the same predicament who have been denied membership in the California Urban Water Conservation Council?
4. On July 1, 2008 V.C. Board of Supervisors approved withdrawing from SCWC and joining AWA due to cost. Does going local v regional matter to the SWRCB?

Sincerely,



Mrs. Teresa Jordan