



General Manager's Report

November 2023

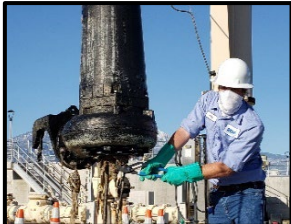


Table of Contents

ADMINISTRATION	1
Customer Service.....	1
Finance and Accounting Department.....	8
Innovation and Technology Department	10
Purchasing Department	12
ENGINEERING AND OPERATIONS.....	13
Engineering Department.....	13
Operations & Maintenance.....	16
Water Resources	30
PUBLIC AFFAIRS.....	31

APPENDIX A – Wastewater and Water Production Tables

APPENDIX B - Federal Update from Carpi & Clay

APPENDIX C – Public Affairs Information

APPENDIX D – Public Comment Letters – Proposed Making Conservation a California Way of Life Regulation

ADMINISTRATION

Customer Service

Customer Experience Enhancement Program

The Customer Service Department is proud to announce the Customer Experience Enhancement Program. This program will provide phone screening and on-the-spot feedback/coaching with a Customer Service representative. Also, the Customer Service team will host "Coffee Talk Wednesdays" providing mini-training and discussions. Weekly training topics include:

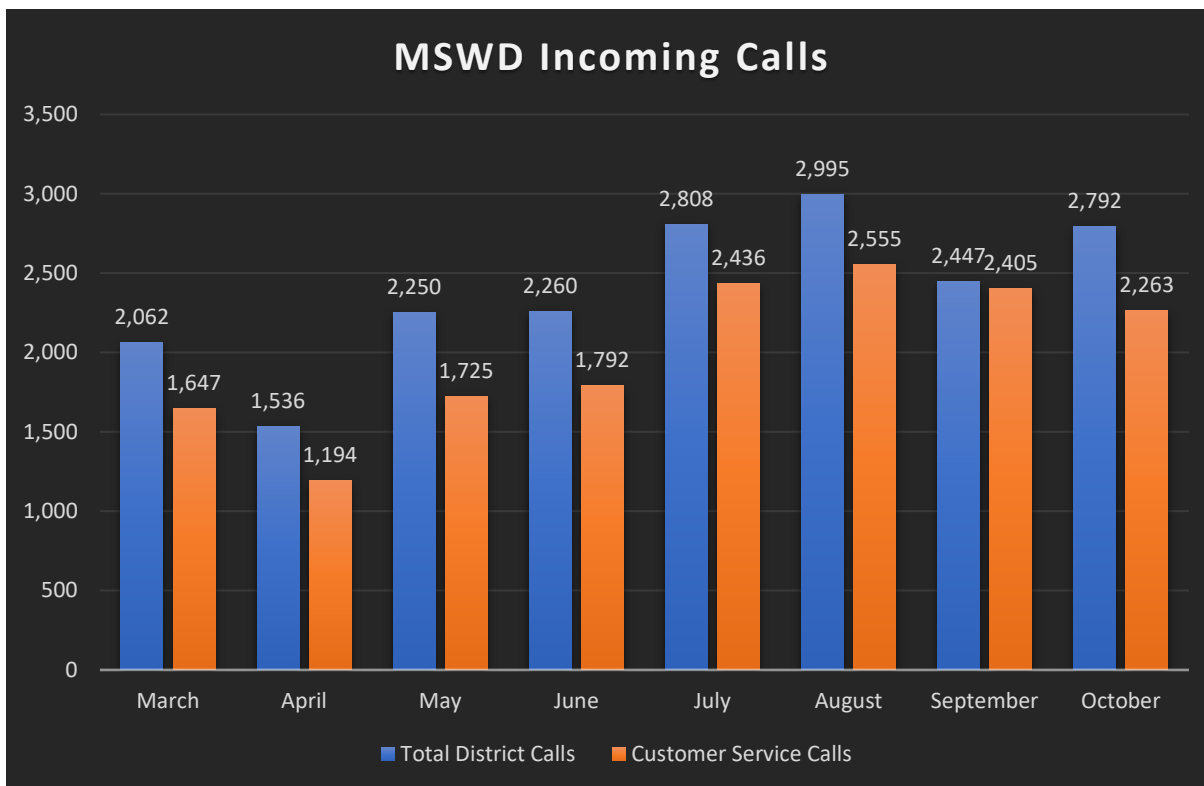


- What does Customer Service mean to You?
- Greeting Customers: the importance of and how to
- Diffusing an Interaction: what can we do to find a solution
- Tone of Your Voice: you can hear a smile through the phone
- Importance of customer inquiry follow-up
- Active Listening: verbal and non-verbal
- Customer Experience versus Customer Service
- Going the Extra Mile: inform, assist, and impress
- The Internal and External Customer



Calls into the Customer Service Department

The District has seen an increase in the number of calls in the last six months. The chart below represents total MSWD incoming calls and those received by the Customer Service staff.

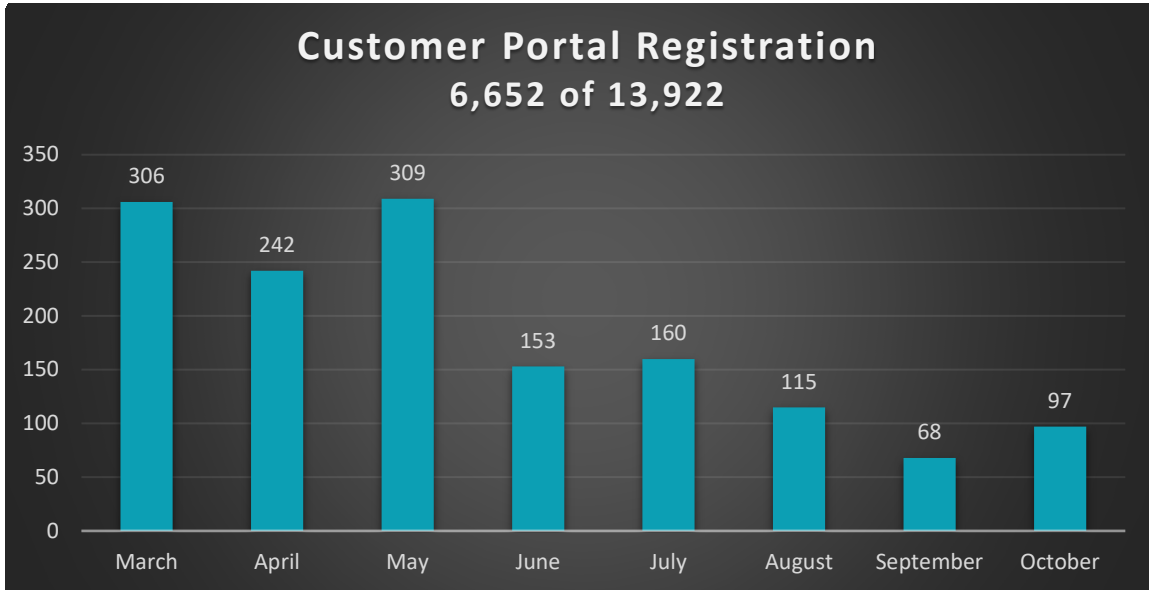


Most calls are related to payment plans, bill assistance information, demand/lien release requests, new property start/stop service, and account balance requests. The table below provides a summary of the number of calls by category received by the Customer Service staff.

Customer Request	Total for October 2023	Monthly Avg. for FY 2024	Total for FY 2024
Water Waste	0	1.25	5
High Bill Calls / Service Line Leaks	8	9.50	38
No Water	11	9.25	37
Disconnections by Request & Non-Pay	110	129.50	518
Reconnections by Request & Non-Pay	87	85.00	340
Service Transfers	95	100.75	403
High/Low Pressure	19	9.25	37
Water Quality	1	2.75	11
Other / Miscellaneous	80	96.00	384

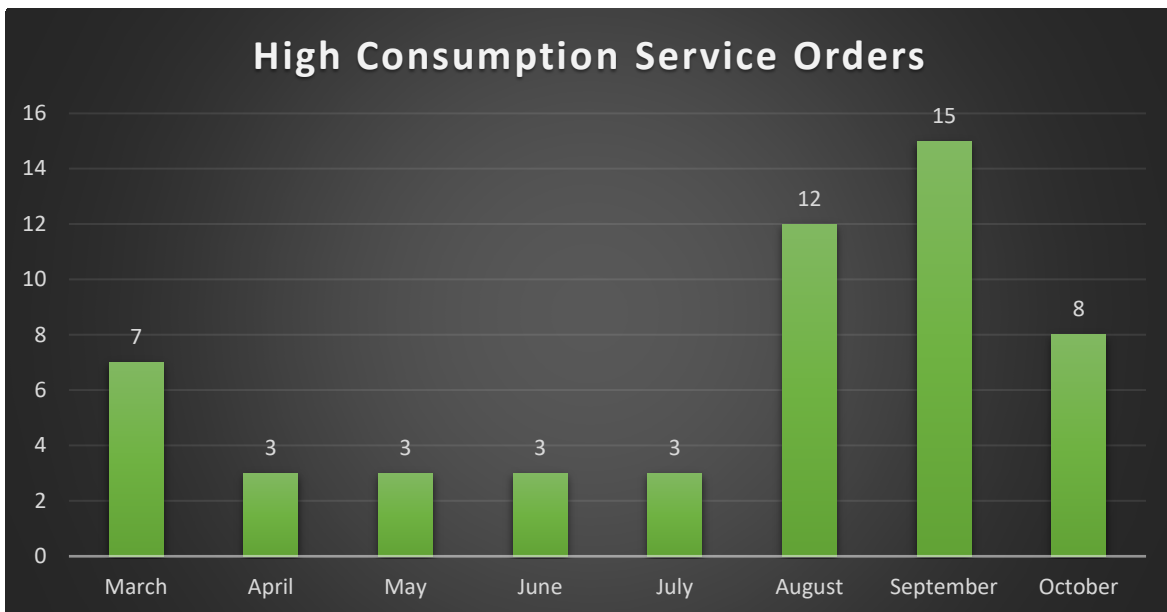
Customer Portal

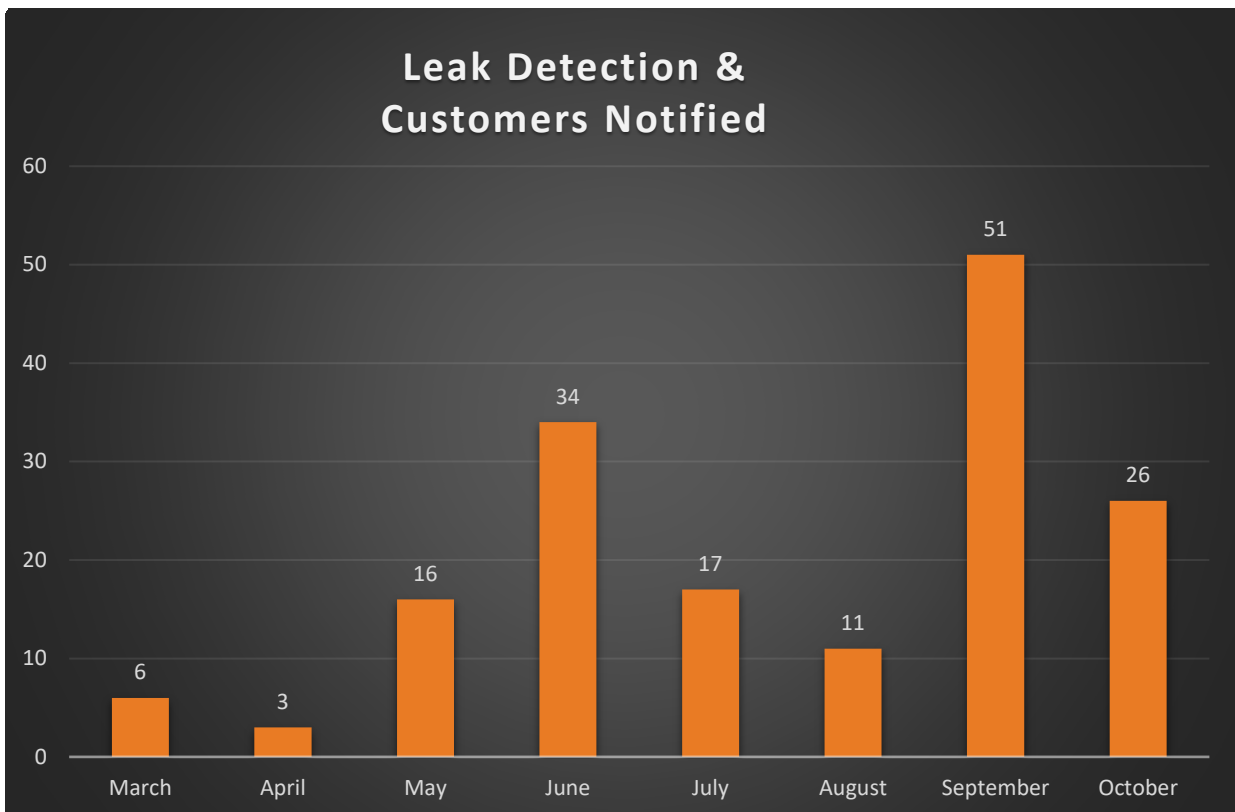
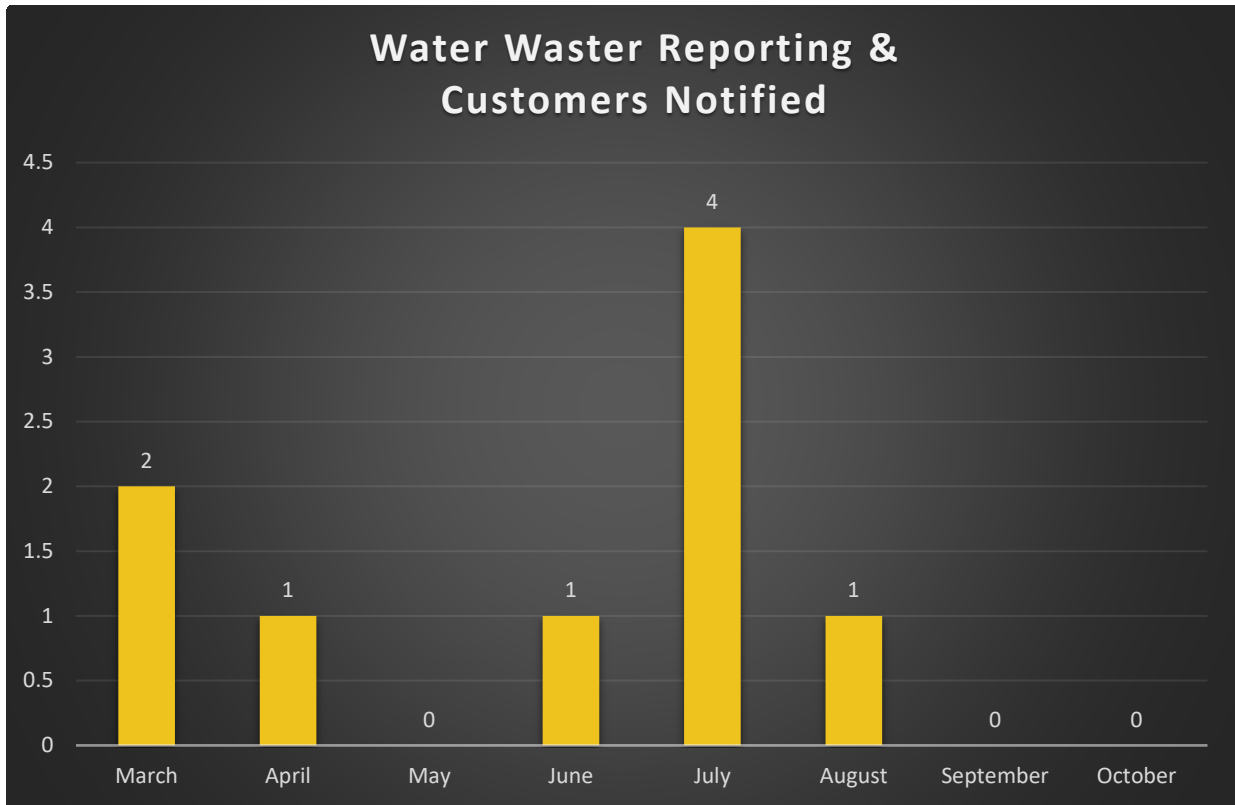
The District has implemented an AMI infrastructure and Neptune 360 portal. All customers are encouraged to sign up for the Customer Portal to access bills and leak alerts. Since launching the portal, customer adoption has reached 48%, or 6,652 customers registered so far.



Monitoring of Customer Accounts

The District continues to leverage the new AMI infrastructure and Neptune 360 portal to investigate high consumption, identify water wasters, and detect leaks. The following charts represent the monitoring results for 13,916 customer accounts by the Customer Service staff.





Customer Bill Assistance Programs

The District continues to facilitate bill assistance programs for the benefit of its customers.

- The United Way Customer Bill Assistance Program continues to be utilized by those customers who need assistance for one billing period annually, paying \$100 per approved customer.
- Riverside County's Low Income Household Water Assistance Program (LIHWAP) Care Program provides customers with a one-time payment towards their water and/or sewer bill up to \$2,000. The U.S. Department of Health and Human Services has permitted the extension of the LIHWAP program through March 31, 2024. Staff will immediately work with Local Service Providers to extend the program through December 31, 2023, and then evaluate further extension of the program.
- Beginning March 13, 2023, LIHWAP will now be able to assist customers even if their account does not have an arrearage. When a customer is not past due on their bill, they will receive a base payment ranging between \$200 - \$371. The amount the customer receives will depend on their household size and income.



The table below summarizes the results of the customer bill assistance programs administered by the Customer Service staff.

Assistance Program	Customers Assisted in October 2024	Total Assistance in October 2024	Total Assistance in FY 2024
United Way of the Desert	9	\$900.00	\$2,800.00
LIHWAP / CAP Riverside	6	\$1,851.00	\$38,067.09
MSWD Payment Plans Last Month	Previous Month Remaining to be Billed	MSWD Current Customer Payment Plans	Current Balance Remaining to be Billed
107	\$44,202.42	124	\$47,592.49



Delinquency Service Disconnections

Staff continued to reach out to customers with delinquent accounts to provide information for assistance and repayment options to avoid disconnection. The table below summarizes the activities of Customer Service staff regarding delinquent accounts.

Fiscal Year	Auto-Dialer Calls to Customers	Door Hangers to Property	Customer Contact to Make Payment Plan	Service Disconnections
2023 – 2024 (Year to Date)	1,901	289	419	187
2022 – 2023	5,107	759	1,171	656
2021 – 2022 (3/24/2022 – 6/30/2022 COVID Moratorium Ended)	1,937	494	378	286
2020 – 2021 (COVID Moratorium)	0	0	0	0
2019 – 2020 (7/1/2019 – 3/9/2020 COVID Moratorium Started)	7,182	1,760	814	667

Customer Bill Pay Options

MSWD Customer Service continues to provide customers with multiple options for bill payment.

- Payment Portal on MSWD.org/Customer Connect.
- Customers can pay at 7-11 in Desert Hot Springs, Palm Springs, Cathedral City, and Yucca Valley; CVS or Walmart in Palm Springs; and Family Dollar in Yucca Valley. Customers must have their bills present.
- Customers can drop payments (check or money order) in the drop box or pay in the lobby.
- Customers can call in and pay through the IVR system, or with Customer Service Representative assistance.
- Pay Near Me is promoting inclusive payment options including: Cash App Pay (New), PayPal, Google Pay, Apple Pay, and the QR code on the back of the bill. Customers can pay directly from their smartphone.



Cash App Pay

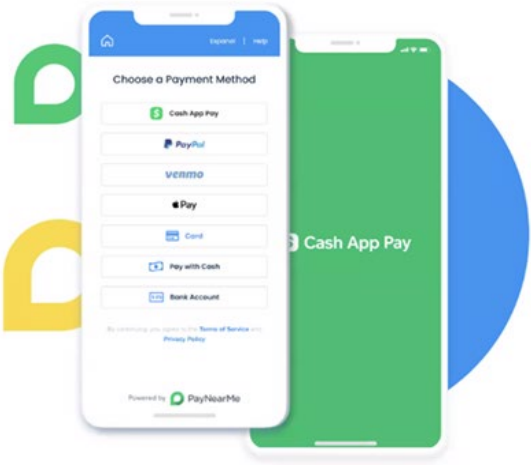
Pay Near Me is excited to announce that Cash App Pay is available as a payment option for billers. According to Pay Near Me research, 1 in 5 consumers say Cash App Pay is an important or very important option for bill pay. Now, Pay Near Me clients can offer even more convenient options for payments.


Cash App Pay entered the market with their peer-to-peer money transfer service years ago and has since amassed 53 million monthly transacting activities as of March 2023. In 2021, the financial services app made it possible for merchants within the Square network to accept consumer payments via Cash App Pay. And recently, they welcomed merchants outside of the Square network, including Pay Near Me clients, to also reap the benefits of Cash App Pay.

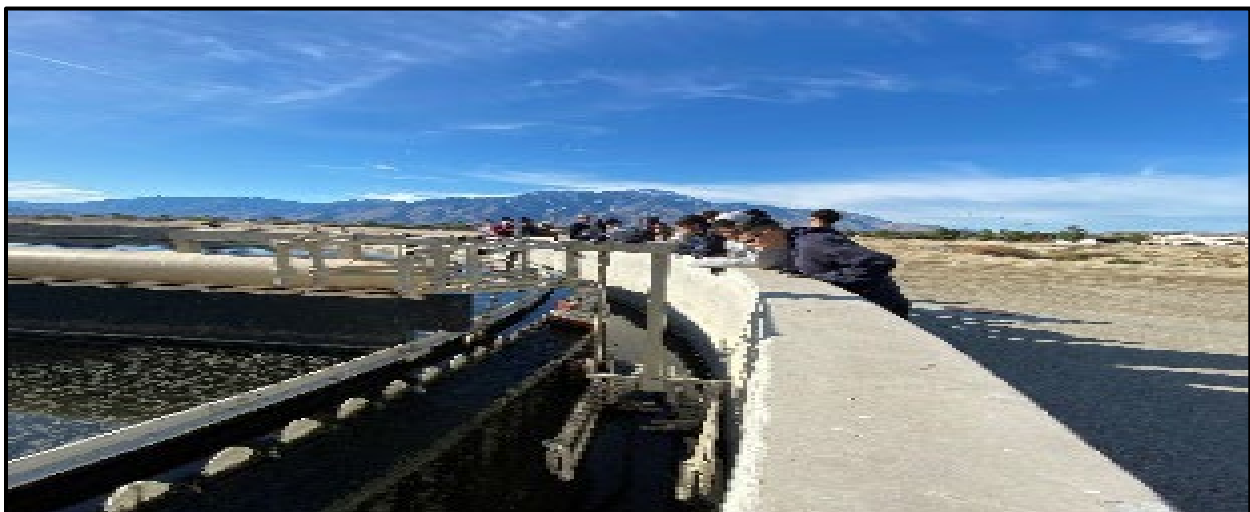
Cash App Pay

Accept payments from the mobile wallets your customers use daily.

- Offer a convenient, online payment option for your underbanked customers.
- More than two-thirds of Cash App's monthly transacting actives are Millennial or Gen Z customers
- Supports one-time, future-dated payments and recurring payments.
- Pay with stored balances
- Mobile-first customer experience



 PayNearMe



Finance and Accounting Department

The Finance and Accounting Department continues to work with its vendors to complete the yearly and necessary tasks to meet State and Federal reporting requirements and the strategic goals established by the MSWD Board of Directors. Below are project highlights and summaries for October 2023.

Current Work Priorities

The Accounting Department continues to support other departments as needed.

Human Resources

- Accounting created a new pay code for the new Bilingual Pay incentive and set up recurring pay for qualifying employees.
- Accounting assisted with the review of employer contributions requirements rates to Incentive Rate Health Plans and processed refunds for employees affected.

Public Affairs

- Reviewed upcoming grant reporting for quarterly coordination.

Engineering and Construction and Maintenance

- One new reimbursable job was requested by Engineering
- Whitewater Ranch – water, improvements review for logistics facility.

Training

Accounting staff attended several trainings during October 2023

- Payroll attended the CalPERS Education Forum in Los Angeles on October 2-4, 2023.
- Accounting staff attended the Cultivating A Collaborative HR/Finance Relationship webinar through CSMFO on October 19, 2023.
- Accounting staff attended the GASB Statement No. 101 Compensated Absences update through GFOA on October 31, 2023.



Budget

Budget transfers in October 2023 for Fiscal Year 2023-2024.

BID	DESCRIPTION OF EXPENDITURE	G/L NUMBER	TRANSFER DATE	TRANSFER AMOUNT	TO BID	TRANSFER TO DESCRIPTION	TRANS TO GL NUMBER
581	WASTEWATER OPERATIONS MATERIALS AND EQUIPMENT	301-5640-53401-000	10-05-2023	3,000.00	579	DIESEL FUEL - HORTON GENERATOR	301-5640-53341-000
695	GROUNDWATER GUARDIAN	101-5320-58001-000	10-17-2023	3,280.00	682	BOTTLED WATER	101-5120-53005-000

Audit

Accounting staff continued to prepare year end schedules and draft financial. Audit field work for the fiscal year began on October 30, 2023, and will continue through November 2023. A majority of the testing will be conducted remotely with an on-site visit scheduled for November 1, 2023.

Cash

Total cash receipts for the month of October 2023 amounted to \$5,004,091. The receipts consisted of \$3M development payment from Skyborne, and the rest mainly consisted of water and sewer customer account payments and property tax collections that include sewer fees placed on the property taxes.

Cash disbursements for the month of October 2023 amounted to \$3,436,602 with the largest payments going to:

- JF Shea Construction - \$1,831,305
- Wells Fargo Bank - \$313,121
- Net Payroll - \$261,583
- Downing Construction - \$254,088
- TKE Engineering - \$170,589
- EFTP-IRS Payroll Tax Remittance - \$101,454
- ACWA-JPIA Health Benefits Authority - \$93,983
- B-81 Paving - \$85,424
- Southern California Edison - \$77,827



Innovation and Technology Department

The Innovation and Technology (IT) Department continues to work with staff and vendors to achieve technological enhancement and meet innovation goals established by the MSWD Board of Directors. Below are project highlights and summaries for October 2023.

Department Updates

IT has completed the onboarding of our five new staff members: Associate Engineer, Accounting Technician Temp, Customer Service Temp, Business Analyst, and Business Analyst Temp.

The IT department is working toward the completion of two bid opportunities. The IT support services RFQ posted in September 2023 and received six proposals by the close date of November 2, 2023. On October 26, 2023, IT released an RFP for the complete setup, management, and implementation of the District's GIS mapping, asset management/maintenance, and workorder management solution. The District expects to see dramatic improvements in work efficiency, data management, and the ability to continue to innovate with the completion of the projects included in this RFP.



On-Going Cyber Security Training

IT continues the monthly anti-phishing training scenarios with staff and Board members. Staff has been diligent in reporting suspicious emails or contacting the IT Manager for review of suspicious emails before acting.

Technology Improvements

IT has ordered a new web server as part of routine hardware replacement for aging equipment. The new server will improve data transmission with billing services.

MSWD continues its push toward paperless operations with the expansion of Laserfiche forms which staff are currently using for managing budgets and submitting overtime. An off-work report form is currently in progress and will eliminate existing paper forms and dramatically speed up the approval process and communication with Accounting for payroll processing.

Cybersecurity improvements continue to be made to improve District security.

Desktop computers and laptop upgrades continue as needed.

Cyber Security News Roundup

The IT Department tracks trends in cyber security to note new opportunities for security and new concerns to defend against. The news below is a brief selection of news intended for informational purposes and provides no insight to the District's cyber security controls.

- Fake Google Chrome update messages have seen increased success in spreading malware to users. A compromised website shows users a message that their web browser requires a security update, which installs malware. Users should be warned to only update their browser from the browser's built-in update feature and never from a website. Similar attacks have been successful with Firefox and Edge browsers. ([Forbes](#))
- The Boeing Company became one of the latest big-name victims of ransomware. Attackers claim to have accomplished the attack through a zero-day exploit. The issue is currently under investigation. ([Cybernews](#))
- President Biden issued an executive order directing new standards for artificial intelligence (AI) safety and security. The order requires rigorous safety testing, controls over the potential for misuse, privacy protection, establishment of standards and best practices for detecting AI-generated content, guidance for government use of AI tools, and ensuring that AI tools are used in the country's best interests at home and globally. ([Whitehouse Briefing Room](#))
- The UK passed the Online Safety Bill, forcing tech companies to take responsibility for content on their platforms and remove content in violation of the bill. The largest challenge to adherence to the bill relates to content transmitted with end-to-end encryption. Messaging platforms such as WhatsApp and Signal have threatened to discontinue operating in the UK due to the extent that the integrity of encryption and privacy would be compromised. ([Cybernews](#))

Purchasing Department

Staff continues to source sanitization supplies to ensure wipes, hand sanitizer, and disinfectants are available to all District buildings and vehicles for the safety of the staff.

Price increases and supply chain issues continue to surface within our industry. Specifically, PVC pipe and fittings, ductile iron pipe and service brass fittings, restraints, hydrants, and valves, as well as many other products, are experiencing significant shortages that could lead to extended lead times. Along with these supply chain problems, pricing continues to escalate. These problems exist with both domestic and import materials. Staff will continue to monitor the situation and perform due diligence in getting all the material that is needed to maintain the water systems.

Total inventory purchases were \$43,483.51, and the total issued for use by field crews totaled \$45,843.81 for October 2023.



ENGINEERING AND OPERATIONS

Engineering Department

Below is a list of Capital Projects and status updates for October 2023.

Well 42 Project

Construction is still on hold due to revisions to the pumping and electrical equipment. The contractor is in the process of procuring the well motor and pump assembly and is coordinating a submittal for the MCC equipment from the manufacturer. Construction will likely be on-hold for several more weeks while the equipment submittals are processed and the equipment is ordered, fabricated, and delivered to the site for construction and installation. Staff is currently securing contract change order costs and anticipates presenting a project update at the December 2023 Board of Directors meeting.

AD-18 – GQPP Sewer Project Areas “H” & “I”

Staff has been unable to reach an agreement with the property owner at the south end of Hildago Street for an easement needed to complete the proposed sewer pipe alignment. As such, Staff is evaluating other options, including a small lift station to avoid the parcel.

Well 22 Rehabilitation

Staff has posted the project for bids on the PlanetBids website. The pre-bid meeting was completed on October 25, 2023, and the bid opening has been rescheduled to December 20, 2023, at 2:00pm. Following the completion of the bidding process, bids will be evaluated, and the lowest responsible and responsive bid will be brought to the Board for award.

Water and Wastewater System Comprehensive Master Plan Updates

Staff has completed review of the draft water and sewer master plans. In addition, staff is reviewing and adjusting the flow model with demand and calibration data. Staff are preparing for the next steps to evaluate future demands and system needs, as well as finalizing the master plans.

AD-18 – GQPP Sewer Project Area “D3-1”

Staff has submitted revised amendment documents to DWR for approval. Following approval, staff anticipates completing the design and CEQA updates to the existing documents, followed by bidding and construction.

AD-18 – GQPP Sewer Project Areas “A” & “G”

The design consultant, Genterra, completed the 90% construction plans and specifications. Staff is completing a plan check of the 90% design package and will provide comments back to the consultant in November 2023. Thereafter, the consultant will complete the final design package.

Backup Generators for Well Sites 27-32 and 37 Projects

Staff received the contract extension from the consultant extending the contract term for one year. Staff have the plans signed and ready for bidding. Staff will review the specifications and prepare the contract documents for bidding purposes to solicit construction bids in early December 2023.

Supplemental Environmental Project

Staff completed the contract/agreement with the contractor. A pre-construction meeting was held on October 26, 2023. The contractor, RE Chaffee, is expected to begin construction in November 2023.

Well 34 Rehabilitation

The project was awarded by the Board in October 2023. Staff is completing the contract/agreement with the contractor, Legend Pump and Well Service, and will begin the pre-construction work immediately thereafter.

Regional Water Reclamation Facility

The Project Team continued processing submittals and responding to RFIs submitted by JF Shea Construction.

JF Shea Construction continued construction on the Regional Water Reclamation Facility (RWRF). Through the month of October 2023, JF Shea Construction:

- Continued outfitting the operations building including insulation, conduits, fire suppression system, cable trays, air ducting, drywall, etc.
- Continued equipping the Headworks area and SBR and AST tanks with ALP piping, fine and course air bubble diffusers, wiring and electrical, valves, lighting, etc.
- Continued excavation and grading of the infiltration pond area.





The Project Team continued the process of contacting property owners to acquire right-of-way along 20th Avenue to construct the third required monitoring well, to be constructed at a later date. Staff continues to coordinate with the property owner to negotiate purchase of the required right-of-way in accordance with the appraisal report.

The Project Team and Staff completed quarterly report updates to the Regional Board regarding two of the Waste Discharge Requirement Permit provisions.

The Project Team continues to coordinate with the State Water Resources Control Board (SWRCB) on the SRF/Grant funding agreement and reimbursement requests.

- Staff completed Reimbursement Request No. 2 and submitted it to the SWRCB.
- Staff continues to check in with the SWRCB regarding approval of the Conveyance Line FBA.

RWRF Conveyance Line

The Project Team continued processing submittals, responding to RFIs, and processing change orders and payment requests submitted by the contractor, Downing Construction. The contractor continued constructing the force main along Dillon Road and has completed the portion Little Morongo Road to approximately 4,800 linear feet east. Staff continues to coordinate with SCE to resolve the easement issue along Little Morongo Road south of 18th Avenue.

Area M2 Sewer Collection System (AD-15)

Staff has completed checking the draft design package and will be returning it to the design consultant, AECOM, to finalize in the coming weeks. The Project Team is working with the design consultant to incorporate water service replacements throughout the project area.

RWRF Roadway Design (19th Avenue, Little Morongo Road, and 20th Avenue)

Staff received approval from the City of Desert Hot Springs for the geometric layout for the proposed roadway. Staff notified the design consultant, TKE Engineering, to begin the 60% design.

Operations & Maintenance

Construction & Maintenance

Water Line Locations

Staff completed approximately 494 water line location requests using iPads and the GeoViewer Mobile app to streamline and manage line locations.



Water System Repairs/Replacement

Staff continued to repair and replace components of the water distribution system keeping it in optimum working order and properly functioning without any interruption. Below is a summary of the repairs and replacements completed in October 2023.

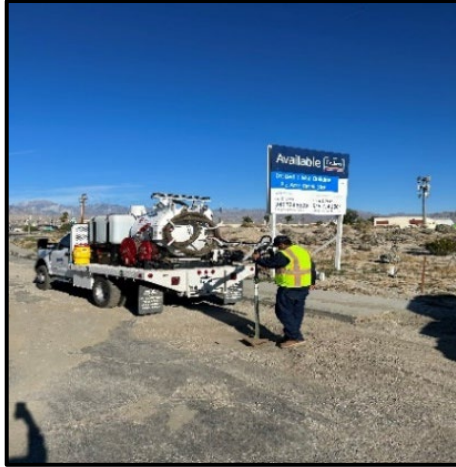
- 16 water service lines were replaced with copper.
- 14 service line leaks were repaired.
- Eight mainline leaks were repaired.
- One hit fire hydrants was repaired.



Water System Maintenance

Staff continued to implement preventative maintenance and inspection programs keeping the water distribution system in optimum working order and properly functioning without any interruption. Below is a summary of the maintenance completed in October 2023.

- 160 ground valves were exercised.
- 68 fire hydrants were flushed, maintained, and painted.
- One air-release valve was inspected and/or rebuilt.
- One blow-off was flushed.



Street/Asphalt Repair (City/County)

The District's contractor, B-81, continued efforts to finalize permanent asphalt repairs from leaks and scheduled work throughout the District. After all pending repairs are completed, repair work will be dispersed quarterly.

CMMS Workorder Program

A total of 60 work orders were processed in October 2023 using the CMMS program.

New Water Meter Service Installation

Staff installed five new water service lines in October 2023.

Fire Flow Testing

Staff continued performing field fire flow tests for the Engineering Department. Five fire flow tests were conducted in October 2023.

Fleet and Facility Maintenance

Janitorial Services

All District buildings continue to be cleaned and disinfected by our janitorial company, Executive Facilities. Routine disinfection is completed four times per week Tuesday through Friday, and routine janitorial services are performed twice per week on Wednesday and Friday.

Building Maintenance

Staff completed the following building maintenance during the month of October 2023:

- Irrigation repairs were completed at the Vista Reservoir and the Well 27/31 site.
- A new screen/monitor was installed, and Interim General Manager Macy's whiteboard was moved into the General Manager office.
- A second spring hinge was added on the door to Robert's office in Stores.
- Removed dead tree from the Administration Building grounds.
- Hung sign to restroom in Corporate Yard shop.
- Greased the shop roll-up door.
- Hosed down the Administration Building roof with Adrian Perea's assistance.
- Performed weed abatement and trash cleanup at the main and west gates at the Corporate Yard.

Standby Generator Monthly Maintenance Program

This testing ensures the generators are in good working order and ready to be used when needed. There were no generator issues in October 2023, however, the 230KW Cummins portable generator remains out of service.

Fleet Maintenance/Repairs

- Unit 399 had a vice reinstalled, preventative maintenance service performed, and new rear tires installed in-house, and repairs made to the rear fuel tank harness by the dealer.
- Unit 404 had a damaged transmission pan and filter replaced, and then was taken to the dealer after repairs for the Ford-specific programming regarding the transmission.
- Unit 432 had all zerk fittings greased.
- Trash pump had a broken pull cord replaced.
- Unit 385 had a Vortex tank replaced along with filters and gaskets for the filter enclosures. Completed welding repairs to the broken tank brackets.
- Unit 423 had batteries and exhaust hanger for generator replaced.
- Units 391, 397, 402, 403, and 428 had preventative maintenance services performed.
- Units 391 and 418 had tire plugs performed.
- Unit 428 had all tires replaced.
- Unit 412 had reverse lights replaced.
- Unit 395 had a wiring harness repair performed.
- Unit 408 had the battery replaced again.
- Unit 342 had the carburetor removed and cleaned due to a running issue.

Wastewater Collections

Sanitary Sewer Overflows (SSOs)

There were no Sanitary Sewer Overflows (SSOs) in the collection system during October 2023.

Dos Palmas Lift Station

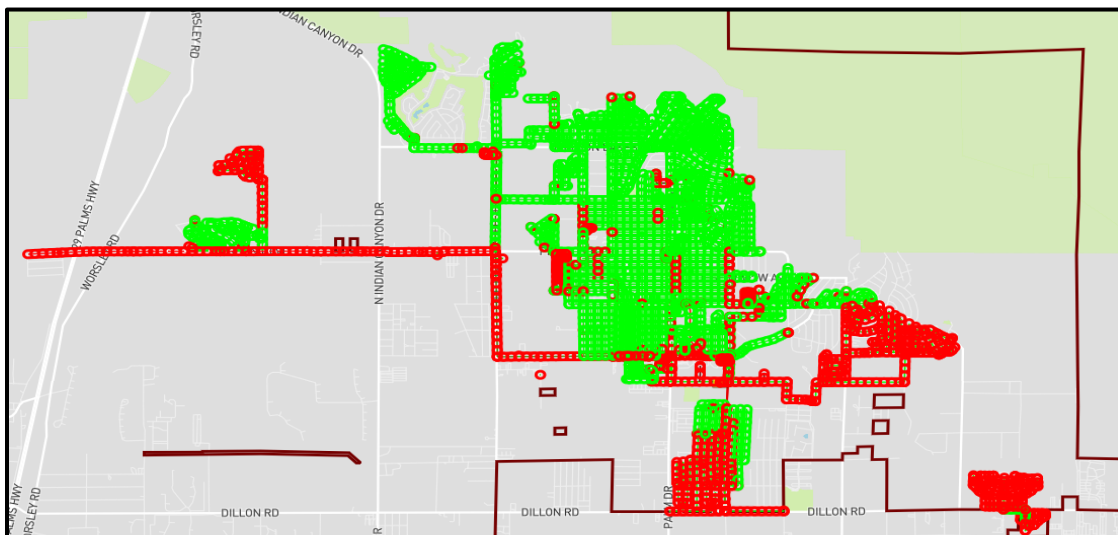
Operators conducted daily site visits at the Dos Palmas Lift Station checking for proper pump operation, ensuring the SCADA system is working properly, and checking site security. Pump 1 is still inoperable, so the Xylem bypass pump is still set up as a backup if Pump 2 fails.

Sewer Line Locations

Staff completed 499 sewer line location requests using iPads and the GeoViewer mobile application to streamline and manage line locations.

Sewer Line/Collections Maintenance

- Staff completed 15 CCTV inspections, totaling 4,134 feet in October 2023.
- Staff cleaned approximately 12.3 miles of sewer mainline in October 2023.



Wastewater Treatment

Plant Maintenance

Staff spent a combined 382.5-man hours performing routine plant maintenance, equipment maintenance, and plant operations at the Horton and Desert Crest Wastewater Treatment Plants (WWTPs). Also, during this timeframe staff spent 130.3-man hours operating the sludge belt filter press, including filling and removing 13 trailers of sludge from the Horton and Desert Crest WWTPs.

Staff inspected RAS pumps 3 and 4 for proper clearances and operation. The motors on both pumps are worn down making exercise noise and vibrations. Staff wanted to ensure that it wasn't the pumps causing damage to the motors or vice versa. Replacement motors have been ordered and will be installed once they arrive.



Staff replaced the batteries for the standby generator at the Horton WWTP. These batteries are replaced every two years to ensure proper operation and dependability.



Sampling and Laboratory

Staff collected 46 samples and spent 67.5-man hours performing laboratory duties and analysis for process control and regulatory reporting purposes. Both wastewater treatment plants are producing an effluent that meets the District's permit discharge requirement.

Staff continued to perform monthly groundwater sampling and sound water levels at the groundwater monitoring wells for the Wright RWRf.

Pond Maintenance

Staff cleaned and rehabilitated Ponds 1, 2, and 8 in October 2023. Staff have begun to rebuild and widen some of the dikes and access roads between the ponds. Staff have begun using material from the bottom of Ponds 1, 2, and 8 to accomplish this task.

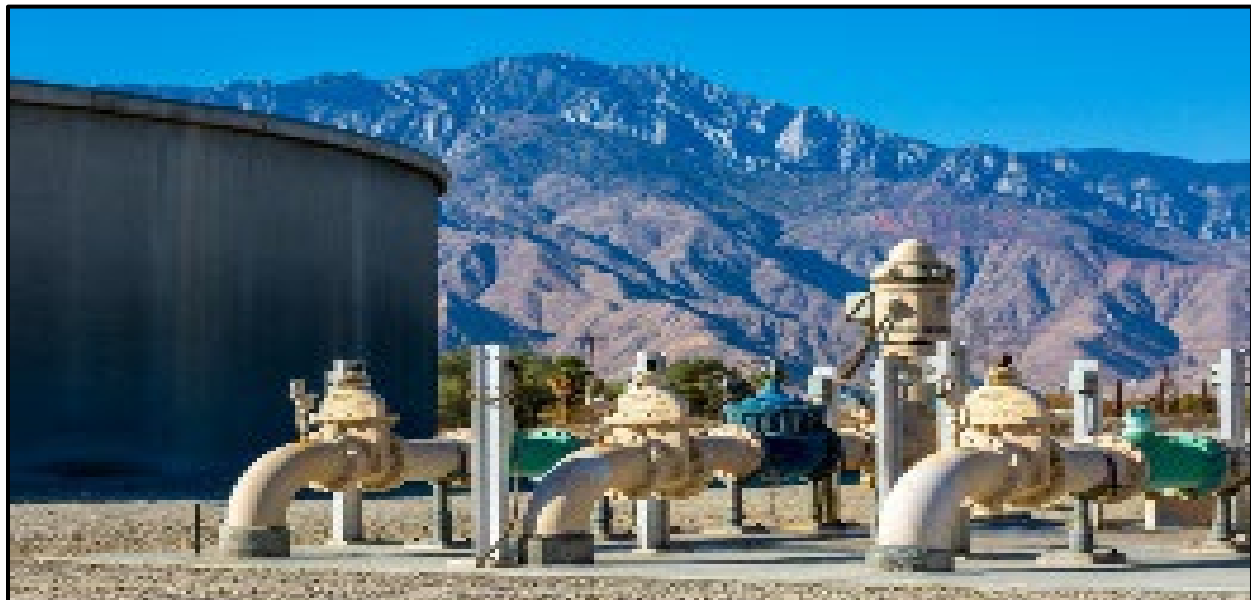


Weekly Wastewater Training

Staff continues to conduct a weekly department “Wastewater Training” program. These training courses are intended to provide all operators with consistent knowledge and a better understanding of processes, including operating equipment in a more proficient manner. This training also aids in keeping operators safe when completing maintenance. This month’s training included:

- Plant Flows and Laboratory Results (Last 12 Month Average)
- Horton WWTP Tank Capacities
- Disaster Preparedness Plan
- Laboratory Reagent Water

	AVG Q	Peak Q	Total monthly Q	INF BOD	INF TSS	INF TDS					
Average	1.967678	2.191384	59.852846	239	149	679					
Maximum	2.047194	2.592078	61.415809	295	242	777					
Minimum	1.917610	2.058816	53.693082	69	62	580					
	AVG Q	Peak Q	Total monthly Q	EFF BOD	EFF TSS	EFF TDS	Domestic TDS	Nitrates	Total N.	pH	
Average	1.967678	2.191384	59.852846	10.2	4.1	600	663	5.11	11.73	7.07	
Maximum	2.047194	2.592078	61.415809	17.0	9.7	656	687	13.00	22.00	7.21	
Minimum	1.917610	2.058816	53.693082	5.0	1.3	543	596	0.97	4.70	6.99	
	MW1	MW2	MW3								
Total Dissolved Solids	660	697	820								
Depth to Groundwater	193	174	169								
Chloride	75	75	77								
Sulfate	220	223	228								
Nitrate as N	5	4	23								
Floride	1	0	1								
Total Nitrogen	9	4	23								
Aluminum	ND	ND	66								



Through continued development in the Desert Hot Springs area, and at the request of new consumers, sanitary services are always being added to the collection system. Below is a summary of new sanitary service connections by month.

New Sanitary Service Connections to Collection System

	2023/24	2022/23	2021/22	2020/21	2019/20	2018/19
July	4	4	18	8	7	9
August	12	26	20	4	1	8
September	17	20	20	5	2	12
October	3	13	36	9	4	8
November		8	29	50	10	9
December		8	12	9	3	3
January		35	14	21	7	1
February		4	7	23	5	1
March		24	17	48	1	0
April		16	7	18	3	3
May		9	16	17	11	3
June		4	2	21	7	3
Annual	36	171	198	233	61	60

Additional sanitary service connection information is provided in Appendix A.

The following table shows the average daily flow and peak daily flow for the Horton and Desert Crest WWTPs.

Monthly Wastewater Flows

WASTEWATER FLOW MGD				
2023/24	HORTON PLANT		DESERT CREST	
	Avg. Daily Flow	Peak 24 hr. Flow	Avg. Daily Flow	Peak 24 hr. Flow
July	1.922043	2.149212	0.050983	0.071200
August	1.929369	2.592078	0.047453	0.067540
September	2.037218	2.182773	0.046081	0.055570
October	2.050049	2.173503	0.040804	0.051000
November				
December				
January				
February				
March				
April				
May				
June				

Additional wastewater flow information is provided in Appendix A.

Water Production

Water Pumped/Produced

During the month of October 2023, the District's three public water systems produced the following quantity of water:

- MSWD (CA3310008) – 702.72 Acre Feet (228.98 MG)
- Palm Springs Crest (CA3310081) – 13.90 Acre Feet (4.53 MG)
- West Palm Springs Village (CA3310078) – 6.08 Acre Feet (1.98 MG)

Water Sampling/Testing

- Staff collected 50 routine samples in Desert Hot Springs, four routine samples in ID-E, seven well samples in Desert Hot Springs, and four well samples in ID-E.
- Staff also collected 16 general physical samples in Desert Hot Springs and two general physical samples in ID-E.
- The monthly uranium sampling at Well 26A was completed on October 2, 2023.
- The MSWD Monthly Coliform Monitoring Report for October 2023 was sent to the SWRCB on November 2, 2023.



Chlorination System Updates

- Staff continued to conduct routine chlorine pump maintenance and inspections at all well sites, making necessary adjustments to all chlorine pumps and/or their related equipment, ensuring proper operation and repairing/rebuilding as needed. All chlorinators were functioning properly in October 2023, with only typical preventative maintenance required for these pumps.
- Staff began cleaning all chlorinators two times per month with a vinegar-based solution to reduce chlorinator issues. All of the chlorine pumps were cleaned during October 2023.

- During the month of October 2023, a total of 2,092 gallons of chlorine (12.5% solution strength) was used to disinfect the distribution system and the production facilities. (Reflects usage in the MSWD and ID-E systems)
- During the month of October 2023, the Production staff checked and documented the chlorine residuals at all the wells that are in-use a total of 239 times. The average chlorine residual of these 239 readings was 1.08 ppm. (Reflects data in the MSWD and ID-E systems)
- During the month of October 2023, the Production staff checked and documented the chlorine residuals throughout the distribution system a total of 97 times. The average chlorine residual of these 97 readings was 0.97 ppm. (Reflects data in the MSWD and ID-E systems)

Well Soundings

Staff continued to sound the groundwater levels for 13 production wells and nine monitoring wells.



Production Facility Updates

Staff continued to oversee all water production sites making necessary adjustments. Staff routinely climb reservoirs and conduct monthly overflow maintenance as needed. Staff also conduct reservoir roof inspections using a drone.

- Well 22 Rehabilitation – The contractor, L.O. Lynch, gave a target completion date by the end of August 2023.
 - Both the mechanical and chemical rehabilitation methods were completed.
 - Test pumping was performed during the first couple of weeks in May 2023. The test pumping provided the important information regarding the possible yield capacity of this well. A maximum flow rate of approximately 1,290 gpm was achieved with a drawdown rate of less than 10 feet. The test pump and motor was pulled during the last week of May 2023.

- A larger pump and motor was installed during the first week of June 2023. A maximum flow rate of approximately 1,500 gpm was achieved, which was less than expected. The constant rate test pumping was performed during the week of June 19, 2023. The test pump equipment was pulled from the well during the week of June 26, 2023.
- The final step is disinfection and outfitting the well with the permanent pump and motor. The downhole equipment has been ordered and there is a minimum 2 month lead time on the pump. The final design flow was determined to be 1,600 gpm.
- As of October 31, 2023, the contractor has installed all of the downhole equipment. The only items remaining are the pump discharge head and the installation of the motor. These items are expected to be installed in early November 2023, and then we will disinfect, pump to waste, and collect Bact samples. Once passed, we will put the well back into service..
- Gateway Fire Pump Monthly Testing – Staff performed the monthly fire pump testing on October 9, 2023. All systems functioned properly. Water loss data was captured and entered into the water loss tracking worksheet.
- Well 22 Trees – Due to a high wind event, staff found a fallen tree on October 23, 2023. The remaining trees on this site were cut down by staff on October 25, 2023.

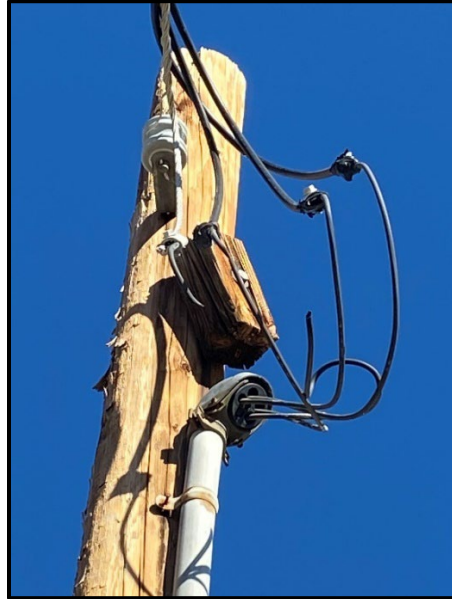


- Well 24 – This well continues to exhibit an unusual amount of vibration. L.O. Lynch was called out on October 31, 2023, to evaluate the vibration and determine a work plan to resolve this issue. We're waiting for a proposal from L.O. Lynch for these repairs to be made.

- Terrace Booster B4 – The motor saver for Terrace Booster B4 kept tripping and provided a fault code for a ground fault trip. The motor was checked with our insulation tester, and the motor checked out all right. Our on-call contractor, McDonald Electric, found that the CTs that were previously installed were one size too large, which was causing erroneous amperage readings on the MotorSaver777. Additionally, the MotorSaver device was replaced due to a faulty alarm contact. The pump is operating properly now.
- Well 29 Chlorine Room – Staff have almost completed this project and is waiting for a delivery of some control wire to complete this installation.
- Oil Changes – The following motors received their semiannual oil changes during the month of October 2023:
 - Two Bunch B1 & B2
 - Terrace B1-B6
- Motor Greasing – All motors for our booster stations and wells (not including submersibles) were greased in the main Desert Hot Springs system during the month of October.
- Terrace B3 – The water-cooling line to discharge head bearing was replaced with stainless steel tubing and fittings on October 18, 2023.
- Transfer Pump Test – With help from Construction & Maintenance, the new potable water transfer pump was used on October 3, 2023, at Well 28 to test its capability to move water from the 1400 Annandale zone into the 1530 Mission Lakes zone. Staff is able to report that the testing worked, and it provided valuable information for future emergencies.
- Low Northridge B2 – Staff was called out on October 16, 2023, due to a failed motor starter. The pump was taken offline while waiting for the repair proposals. Three proposals were received for this issue and McDonald Electric came in with the lowest price. We anticipate this repair/upgrade to be completed within the first week of November 2023.



- Gateway Booster – The site experienced a power outage on October 22, 2023. Our portable emergency generator was deployed to this site while SCE made the repairs. It was found that two of the conductors were broken at the top of our power pole due to high winds and flex fatigue. SCE made the repairs and the site is back into normal operation.



- Salt Nutrient Management Plan Data Request – Staff have been working with TKE Engineering and the Engineering Department to retain cost estimates to complete the required SNMP well test pumping for Wells 1, 5, 28, 34, and 35. Initially, it also included monitoring Well 11, however, staff determined that this well was dry after attempting to confirm groundwater level with a wire sounder on October 30, 2023 (TKE was notified.). The test pumping and sampling is due by December 31, 2023.

Well 33 Solar Site

Staff continues to monitor the performance of the solar system. The October 2023 Monthly Performance Report showed that the system produced 170,049 kilowatt hours, which is within 97.6% of expected energy output.



Through continued development in the Desert Hot Springs area and at the request of new customers, water services are always being added. Below is a summary of new water services added each month.

New Service Connections to the Water System

	2023/24	2022/23	2021/22	2020/21	2019/20	2018/19
July	5	6	18	7	4	5
August	14	28	19	6	10	5
September	19	22	23	18	2	14
October	3	16	33	13	3	21
November		10	27	10	16	4
December		9	9	2	17	3
January		26	14	15	6	3
February		14	8	13	8	5
March		29	19	16	2	3
April		24	6	11	1	3
May		16	19	15	12	5
June		5	1	24	11	2
Annual	41	205	196	150	92	73
Avg./ Mo.	3.42	17.08	16.33	12.50	7.67	6.08

Additional water service connection information is provided in Appendix A.

As expected, the new water services increase the amount of water needed to be pumped; however, the weather and water conservation continue to be the primary factor in MSWD water production. The following table summarizes the MSWD water production for each month.

Monthly Water Production

	FY	Variance		FY	FY	FY	FY
	2023/24	from prior year		2022/23	2021/22	2020/21	2019/20
	AF	AF	%	AF	AF	AF	AF
July	789.99	38.20	5.08%	751.79	796.57	857.77	853.23
August	737.74	-112.45	-13.23%	850.19	839.93	885.31	795.18
September	675.06	-40.97	-5.72%	716.03	738.65	784.80	757.08
October	709.23	17.25	2.49%	691.98	665.18	755.84	709.39
November		-	0.00%	599.39	679.85	690.13	619.87
December		-	0.00%	554.27	565.48	588.32	537.23
January		-	0.00%	530.39	580.28	537.96	553.20
February		-	0.00%	490.41	527.34	495.61	520.85
March		-	0.00%	500.37	601.44	625.80	557.73
April		-	0.00%	552.34	624.07	649.34	573.02
May		-	0.00%	726.25	745.36	723.62	698.99
June		-	0.00%	682.09	730.02	761.63	806.02
TOTAL	2,912.02	-97.97	-3.25%	7,645.50	8,094.17	8,356.13	7,981.79

Additional water production information is provided in Appendix A.

Water Resources

Below is a list of water resources related activities for October 2023:

Integrated Regional Water Management Planning

The Coachella Valley Regional Water Management Group (CVRWVG) met to discuss on-going grant funded projects and upcoming grant opportunities. The CVRWVG implements the Integrated Regional Water Management (IRWM) Plan for the Coachella Valley IRWM Region.

The CVRWVG agencies continued discussing the proposed State Water Board regulatory framework for making water conservation a California way of life. This includes a new Water Use Efficiency Objective annual reporting. The first annual report is due on January 1, 2024.

Mission Creek Subbasin Sustainable Groundwater Management Act Compliance

The 2022 Alternative Plan Update for the Mission Creek Subbasin is still with the California Department of Water Resources (DWR) for review, however, DWR doesn't anticipate completing reviews of alternative plans until 2024.

San Geronio Pass Subbasin Sustainable Groundwater Management Act Compliance

On October 26, 2023, DWR released their determination on the 2022 Groundwater Sustainability Plan (GSP) for the San Geronio Pass Subbasin, approving the plan. DWR found that "The San Geronio Pass Subbasin GSP conforms with Water Code Sections 10727.2 and 10727.4 of SGMA and substantially complies with the GSP Regulations. Implementation of the GSP will likely achieve the sustainability goal for the San Geronio Pass Subbasin." In DWR's review, they identified six recommended corrective actions to be addressed for the first periodic assessment of the GSP, due to DWR no later than January 25, 2027.

Indio Subbasin Sustainable Groundwater Management Act Compliance

The 2022 Alternative Plan Update for the Indio Subbasin is still with the DWR for review, however, DWR doesn't anticipate completing reviews of alternative plans until 2024.

Salt and Nutrient Management Planning

Staff attended the monthly Steering Committee meeting on October 25, 2023, for the Coachella Valley Salt and Nutrient Management Plan (CV SNMP) Update. The focus was on addressing final comments on the Task 1 Technical Memorandum – Characterize TDS/N Mass Loading to the Coachella Valley Groundwater Basin. The Task 1 Technical Memorandum will be released for public review in November 2023.

Go Girl Blueprint for Success: November 3, 2023



MSWD recently participated in the Go Girl Blueprint for Success fundraising luncheon, which supports scholarships for women 25 years or older interested in returning to college to obtain higher education. MSWD was part of a DVBA group supporting award recipient Gretchen Gutierrez and the DVBA, who were recognized for supporting women in the building industry.

Miracle Awards: November 7, 2023

MSWD was one of several organizations and private donors honored for their generosity and support of the homeless community at the Miracle Awards, presented by Team Mom Charities.



DVBA Golf Tournament: November 9, 2023, 8:00am



MSWD is a proud Water Sponsor of the Desert Valley Builders annual golf competition. All golfers will receive a bottle of MSWD's award-winning water, and MSWD staff will be present to help facilitate the event.



CVCAN Golf Tournament: November 17, 2023, 8:00am

MSWD is a proud Water Sponsor of the CVCAN Putt and Puff golf competition. The valley's first event of its kind is being held at the Shadow Mountain Gold Club.

Desert Hot Springs State of the City: November 16, 2023, 11:30am



MSWD is proud to sponsor the Desert Hot Springs State of the City presentation, brought to us by the Greater Coachella Valley Chamber of Commerce. Members of the public, local officials, and the business community will join together to learn about what is taking place in our fine city. MSWD will have an informational booth, and our award-winning water will be at each place setting.

ACWA Fall Conference: November 28-30, 2023

The ACWA 2023 Fall Conference & Expo will feature keynote addresses from California Secretary for Environmental Protection Yana Garcia and Public Policy Institute of California (PPIC) President and CEO Tani Cantil-Sakauye. Garcia will deliver the Wednesday opening keynote address, and Cantil-Sakauye will speak as Thursday's keynote speaker.



Desert Hot Springs Women's Club Black and White Fundraiser: December 2, 2023

MSWD is a proud table sponsor for this year's Desert Hot Springs Women's Club Black and White fundraiser. Focused on providing scholarships to Desert Hot Springs youth, this is one of the club's primary fundraising events of the year.



City of Desert Hot Springs Holiday Parade: December 9, 2023



Team MSWD will once again participate in the Desert Hot Springs Holiday Parade. This year's theme is "1963-2023 Holiday Traditions," which is a nod to the city's 60th anniversary. MSWD is proud to once again participate in this event.

Water 101: Let's Talk Water: August – December 2023

MSWD launched a new fall series of the popular Water 101: Let's Talk Water community workshops. The monthly courses at the new Desert Hot Springs Library from 6:00-7:00pm discuss the District's water and wastewater systems, finances, and planning functions. The second session was held on October 26, 2023, and featured information about our wastewater system. Upcoming sessions include:

- November 9, 2023: Budgets, Rate Setting, and Customer Service
- December 21, 2023: Water Supply and Coachella Valley Collaboration

If any other events occur throughout the month, they will be communicated either from the Public Affairs team or Dori Petee.



Public & Media Outreach

MSWD in the News

MSWD Board President Russ Martin was recently featured in a City of Desert Hot Springs and Palm Springs Visitor's Bureau video series on KMIR/NBC. Viewers were encouraged to embark on a delightful journey through our city with the launch of "Discover Desert Hot Springs"! Brooke Beare hosts this series, which promises a perfect blend of fun and information about our unique oasis. The second clip of the series focused on water and included:



- A dive deep into the hot and cold water aquifers beneath our feet
- Special feature with MSWD Board President Russ Martin
- Watch Now: <https://youtu.be/00xWcDNcelM>

New MSWD Billboard

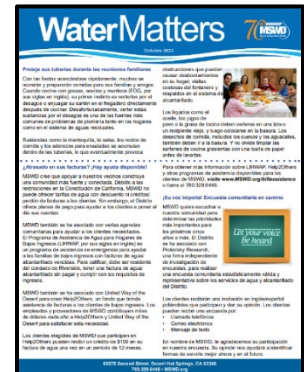
In November 2023, in honor of the family gatherings and holiday cooking about to take place, the MSWD will remind residents to keep Fats, Oils, Grease, and wipes out of the sewer system.



Customer Newsletter

Our October 2023 Water Matters newsletter featured information about the holidays and Pipe Protection, Bill Payment Assurance options, and the MSWD Community Survey currently underway.

A copy of the newsletter is included in Appendix C.



Water Professionals Week (October 7-15, 2023)

Celebrated by water agencies throughout the State, Water Professionals Appreciation Week brings public awareness to the important role water industry professionals and local public water agencies play. To show its appreciation, MSWD highlighted several employees on its social media platforms and website.

Cynthia Acosta, Office Specialist II

Going with the flow has been the mantra of Office Specialist II Cynthia Acosta, who seems to effortlessly handle any new challenge that comes her way. Since joining the MSWD team in August 2022 as a temporary employee, her willingness to learn and her adaptability have made her a key resource of the District. [READ MORE](#)

David Pena, Field Service Representative II

They say that everyone loves a good mystery, but a more accurate turn of phrase would be that everyone loves a good solution. Just ask Field Service Representative II David Pena, who has worked at MSWD for the past 18.5 years. As part of his regular duties, David works with his team on a number of customer-related services that take place in the field, including meter charge-outs and inspections, backflow inspections, and new customer connections and shutoffs. [READ MORE](#)

Ana Murillo, Accounting Technician

To Accounting Technician Ana Murillo, MSWD represents one important thing—community. Being the community's water and wastewater provider is something Ana takes great pride in. [READ MORE](#)

Jason Weekley, Lead Field Operations Technician

According to MSWD's Jason Weekley, every day is an opportunity to learn something new. As part of his everyday duties as a Lead Field Operations Technician, Jason works with and oversees his crew as they perform various maintenance-related tasks, including water valve and service line replacements and hydrant installations. [READ MORE](#)

Lisa Pelton, Customer Service Representative II

As a life-long resident of Desert Hot Springs, Customer Service Representative II Lisa Pelton has a special bond with her customers. To her, they are like family. They are the people she sees around town at special events, the post office, or even the grocery store. [READ MORE](#)

Strategic Planning Effort

MSWD kicked off our Strategic Planning Efforts in October 2023, holding a special Board workshop that took a deep dive into our Mission, Vision, and Values statements to determine if they align with the District's current goals and objectives.



Additional workshops will be held on November 21, 2023 (Board and Strategic Planning Committee), November 28, 2023 (All Employees), and December 5, 2023 (Board and Strategic Planning Committee). We anticipate the final plan will be brought back to the Board for final adoption in December 2023.

Holiday and Community Giving Opportunities for Employees

We have several events and opportunities for community giving this holiday season.

Thanksgiving Canned Food Drive, November 6-21, 2023

This Thanksgiving, we are encouraging employees to give at least two cans each for a canned food drive benefiting Team Mom Charities, which will distribute hot meals and food directly to the homeless within Desert Hot Springs this holiday season. Collection boxes have been set up in both the Administration Building and the Corporate Yard breakroom.



Snowflake Employee Toy Drive, Now through December 6, 2023



MSWD employees are collecting unwrapped toys for children in need this holiday season. Working through Riverside County's First 5 Program, MSWD has 40 snowflake wishes from local children. We already have 20 pledges and hope to get 20 more employee reservations before our December 6, 2023 holiday party. Employees who bring an unwrapped toy for a child in need will receive an extra raffle ticket in our employee holiday drawing. Children's wishes vary by child and age group; most are modest requests ranging from hoodie sweatshirts to toy cars or board games.

Desert Hot Springs Parade of Lights December 9, 2023

MSWD Holiday Float Committee is busy designing this year's entry into the Desert Hot Springs Parade of Lights Parade. Members of the Board, Employees, and their families are welcome to ride or walk alongside the float.



Legislative Update

Federal: McCarthy Removed as Speaker of the House

On October 3, 2023, for the first time in 113 years, the House voted on a motion to vacate the Speaker of the House. The motion passed by a vote of 216-210, with 8 Republicans joining all Democrats, resulting in Kevin McCarthy (R-CA) being removed as Speaker. Under the rules, the House cannot conduct any activity on the floor until a Speaker is elected. Rep. Patrick McHenry (R-NC) was appointed as Speaker Pro Tempore until a Speaker was elected. McHenry's role is limited and can only bring the House in and out of session to vote on a Speaker. Since October 3, 2023, the House Republican caucus has put forth four candidates for Speaker: House Majority Leader Steve Scalise (R-LA), House Judiciary Committee Chair Jim Jordan (R-OH), House Majority Whip Tom Emmer (R-MN), and Vice Chair of the House Republican Caucus Mike Johnson (R-LA). Neither Scalise, Jordan, or Emmer were able to secure the 218 votes needed to become Speaker. On October 25, 2023, Rep. Mike Johnson was elected Speaker by a vote of 220-209. All Republican Members present voted for Johnson. Speaker Johnson became the first Speaker of the House to come from Louisiana. For additional Federal updates, please see Appendix B.

California: Conservation a Way of Life, Proposed SWRCB Rulemaking

As was discussed in last month's report, the State Water Resources Control Board (SWRCB) held a public workshop to discuss the Conservation as a Way of Life Rulemaking Framework. Director Robert Griffith and Interim General Manager Brian Macy attended the workshop and Director Griffith provided comments during the public comment period. Under the proposed rulemaking, MSWD would be forced to institute programs and rate structure that would support the following water conservation:

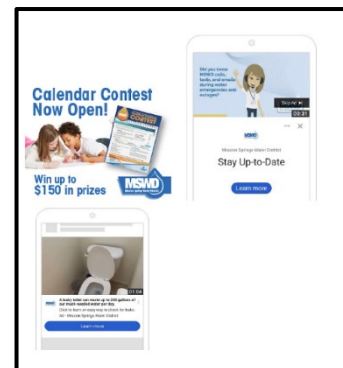
- 19% by 2025
- 40% by 2030
- 42% by 2035

While MSWD supports the State's water efficiency efforts, we do not believe the targets are reasonable, or even feasible, for our customers. MSWD was a signatory on several industry and community letters that echoed this sentiment, copies of which are located in Appendix D. This includes comments from MSWD, ACWA, CVRWGMG, City of Desert Hot Springs, Water Coalition Group, and the DVBA.

MSWD Digital Advertising

The District featured three Google and Facebook/Instagram ads promoting various MSWD programs.

The campaigns garnered more than 87,281 impressions and 640 link clicks. Our Facebook ads garnered more than 60,250 impressions and 262 link clicks. A full report is included in Appendix C.



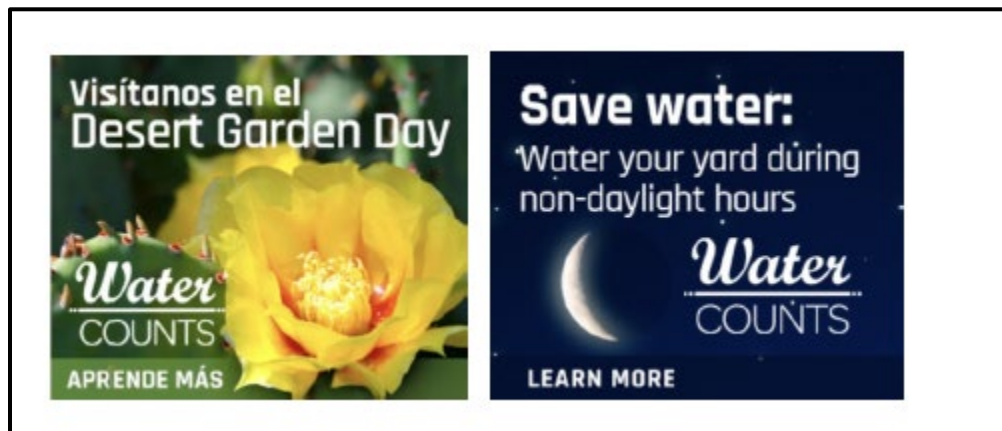
Social Media

A copy of the October 2023 social media report can be found in Appendix C. This report highlights activities and posts on the District's social media platforms. Some of our most engaging posts included Water Professionals Week, the Calendar Contest, and our Worker Wed posts.

CV Water Counts

Nearly 1,800 people viewed at least one page on the CV Water Counts website during October 2023. The Conservation Tips page was the most viewed page on the site, thanks to the accompanying ad campaigns. On Facebook, posts had over 91,000 impressions during October 2023, while Instagram posts had over 5,100 impressions. The email campaign continues to have a very impressive open rate at nearly 60% (the industry standard is only 17.49%).

A full report is in Appendix C.



Rebates & Conservation

The Public Affairs team continued to promote rebates and conservation throughout our service territory during October 2023.

Toilet Rebates

There were three toilet rebates funded in October 2023, totaling \$400.

Turf Rebates

There was one new turf rebate application received in October 2023, which upon completion will be paid \$1,670. There is also one pending application for \$3,000.

Conservation Kits

There were no new requests for Conservation Kits in October 2023.

Bottle Water Tracking Report

No water was donated in October 2023 due to the low inventory.

APPENDIX A – Wastewater and Water Production Tables

WASTEWATER REPORT

SEWER CONNECTION SUMMARY

	2023/24	2022/23	2021/22	2020/21	2019/20	2018/19	2017/18	2016/17	2015/16	2014/15	2013/14	2012/13	2011/12
July	4	4	18	8	7	9	51	2	1	139	2	0	0
August	12	26	20	4	1	8	53	2	4	214	4	0	2
September	17	20	20	5	2	12	8	11	2	90	2	1	0
October	3	13	36	9	4	8	12	4	21	65	8	2	1
November		8	29	50	10	9	7	7	1	52	18	7	3
December		8	12	9	3	3	64	1	0	86	22	11	2
January		35	14	21	7	1	16	8	3	27	3	11	1
February		4	7	23	5	1	42	0	3	5	46	6	1
March		24	17	48	1	0	23	5	0	31	16	2	1
April		16	7	18	3	3	15	30	0	8	95	14	3
May		9	16	17	11	3	20	45	7	13	98	3	2
June		4	2	21	7	3	6	70	4	4	72	2	0
Annual	36	171	198	233	61	60	317	185	46	734	386	59	16

Connections to Sewer Collection System:

As of June 30, 2023 8,836

Plus YTD 36

Total Sewer Connections = 8,872

WASTEWATER FLOW MGD

2023/24	HORTON PLANT		DESERT CREST	
	Avg. Daily Flow	Peak 24 hr. Flow	Avg. Daily Flow	Peak 24 hr. Flow
July	1.922043	2.149212	0.050983	0.071200
August	1.929369	2.592078	0.047453	0.067540
September	2.037218	2.182773	0.046081	0.055570
October	2.050049	2.173503	0.040804	0.051000
November				
December				
January				
February				
March				
April				
May				
June				

WASTEWATER FLOW MGD

2022/23	HORTON PLANT		DESERT CREST	
	Avg. Daily Flow	Peak 24 hr. Flow	Avg. Daily Flow	Peak 24 hr. Flow
July	1.980020	2.086591	0.038856	0.045610
August	2.007484	2.156507	0.043378	0.051750
September	2.085598	2.243680	0.042339	0.047130
October	1.980283	2.266199	0.045616	0.052230
November	1.966075	2.124845	0.045861	0.050330
December	1.963779	2.145901	0.041817	0.050300
January	1.954007	2.142796	0.043181	0.048220
February	1.917610	2.093768	0.041724	0.056170
March	1.977725	2.134190	0.042863	0.047530
April	2.047194	2.217048	0.037373	0.047160
May	1.977976	2.188987	0.040162	0.059330
June	1.938862	2.058816	0.049741	0.067470

WATER REPORT

WATER CONNECTION SUMMARY													
	2023/24	2022/23	2021/22	2020/21	2019/20	2018/19	2017/18	2016/17	2015/16	2014/15	2013/14	2012/13	2011/12
July	5	6	18	7	4	5	7	2	0	0	1	0	0
August	14	28	19	6	10	5	3	2	2	0	1	0	0
September	19	22	23	18	2	14	4	13	3	0	2	2	0
October	3	16	33	13	3	21	8	3	20	0	5	1	1
November		10	27	10	16	4	0	7	3	0	1	0	1
December		9	9	2	17	3	3	2	0	0	2	0	0
January		26	14	15	6	3	20	1	1	2	2	0	0
February		14	8	13	8	5	11	1	0	1	0	1	0
March		29	19	16	2	3	6	5	0	12	0	0	4
April		24	6	11	1	3	7	11	2	7	0	1	4
May		16	19	15	12	5	11	9	8	2	0	1	2
June		5	1	24	11	2	8	2	10	1	0	0	0
Annual	41	205	196	150	92	73	88	58	49	25	14	6	12
Avg./ Mo.	3.42	17.08	16.33	12.50	7.67	6.08	7.33	4.83	4.08	2.08	1.17	0.50	1.00

Connections to Water System:

As of June 30, 2023 13,542

Plus YTD 41

Total Water Connections = 13,583

WATER PRODUCTION SUMMARY													
	FY 2023/24	Variance from prior year		FY 2022/23	FY 2021/22	FY 2020/21	FY 2019/20	FY 2018/19	FY 2017/18	FY 2016/17	FY 2015/16	FY 2014/15	FY 2013/14
	AF	AF	%	AF	AF	AF	AF	AF	AF	AF	AF	AF	AF
July	789.99	38.20	5.08%	751.79	796.57	857.77	853.23	857.20	835.87	714.50	659.11	859.00	942.82
August	737.74	-112.45	-13.23%	850.19	839.93	885.31	795.18	806.47	829.93	808.54	706.62	730.71	828.60
September	675.06	-40.97	-5.72%	716.03	738.65	784.80	757.08	689.47	712.40	679.54	657.37	800.67	813.20
October	709.23	17.25	2.49%	691.98	665.18	755.84	709.39	709.81	733.86	678.33	575.86	716.30	716.09
November		-	0.00%	599.39	679.85	690.13	619.87	631.75	642.41	601.89	582.22	533.69	557.05
December		-	0.00%	554.27	565.48	588.32	537.23	502.16	584.24	520.63	503.10	590.83	633.09
January		-	0.00%	530.39	580.28	537.96	553.20	570.20	599.52	465.10	431.38	526.86	582.86
February		-	0.00%	490.41	527.34	495.61	520.85	415.49	512.79	453.39	483.92	506.49	522.87
March		-	0.00%	500.37	601.44	625.80	557.73	490.92	536.09	549.50	514.05	614.94	603.89
April		-	0.00%	552.34	624.07	649.34	573.02	635.08	644.06	540.56	502.36	622.58	664.05
May		-	0.00%	726.25	745.36	723.62	698.99	598.36	697.15	731.81	601.83	590.28	708.18
June		-	0.00%	682.09	730.02	761.63	806.02	710.39	688.74	732.68	685.93	706.34	812.96
TOTAL	2,912.02	-97.97	-3.25%	7,645.50	8,094.17	8,356.13	7,981.79	7,617.30	8,017.06	7,476.47	6,903.75	7,798.69	8,385.66

APPENDIX B – Federal Update from Carpi & Clay

McCarthy Removed as Speaker of the House

On October 3rd, for the first time in 113 years, the House voted on a motion to vacate the Speaker of the House. The motion passed by a vote of 216-210, with 8 Republicans joining all Democrats, resulting in Kevin McCarthy (R-CA) being removed as Speaker. Under the rules, the House cannot conduct any activity on the floor until a Speaker is elected. Rep. Patrick McHenry (R-NC) was appointed as Speaker Pro Tempore until a Speaker is elected. McHenry's role is limited and can only bring the House in and out of session to vote on a Speaker. Since October 3rd, the House Republican caucus put forth four candidates for Speaker: House Majority Leader Steve Scalise (R-LA), House Judiciary Committee Chair Jim Jordan (R-OH), House Majority Whip Tom Emmer (R-MN) and Vice Chair of the House Republican Caucus Mike Johnson (R-LA). Neither Scalise, Jordan, or Emmer were able to secure the 218 votes needed to become Speaker. On October 25th, Rep. Mike Johnson was elected Speaker by a vote of 220-209. All Republican Members present voted for Johnson. Speaker Johnson became the first Speaker of the House to come from the state of Louisiana.

FY24 Appropriations Update

Both the House and the Senate are continuing to move their respective Fiscal Year 2024 (FY24) appropriations bills. Last week the House passed the Energy and Water Appropriations bill ([H.R. 4394](#)) by a vote of 210-199. The House plans to continue to work on passing the remaining FY24 appropriations bills in November. The Senate is considering its first minibus package that includes the Military Construction-Veterans Affairs, Agriculture, and the Transportation-Housing and Urban Development appropriations bills. There have been several votes on amendments, most notably the rejection of an amendment by Senator Mike Braun (R-ID) that would have prohibited \ community project funding. The federal government is currently being funded through a Continuing Resolution (CR) which is set to expire on November 17th.

White House Sends \$106 Billion International Supplemental Request to Congress

The White House submitted a \$106 billion supplemental [funding request](#) to Congress which included the following:

- \$61.4 billion for Ukraine
- \$14.3 billion for Israel

- \$13.6 billion for border security
- \$9.2 billion in humanitarian aid for Ukraine, Israel, and Gaza
- \$7.4 billion for the Indo-Pacific region

Both the House and the Senate will begin consideration of the President's supplemental request this week.

White House Sends \$55.9 Billion Domestic Supplemental Request to Congress

The White House submitted an additional \$55.9 billion supplemental [funding request](#) to Congress that includes the following:

- \$23.5 billion for disaster response and recovery
- \$16 billion for childcare programs
- \$6 billion for the Affordable Connectivity Program
- \$6 billion for energy and security programs
- \$1.6 billion for the Low-Income Home Energy Assistance Program (LIHEAP)
- \$1.55 billion for State Opioid Response grants
- \$1.05 billion for international food assistance programs
- \$220 million for federal wildland firefighter salaries

Senator Butler Will Not Seek Full Term

Senator Laphonza Butler (D-CA) announced that she will not be seeking a full six-year term in the Senate in 2024. She will remain in office for the duration of Senator Dianne Feinstein's term, which ends at the end of 2024.

California Senators Receive New Committee Assignments

Senate Majority Leader Chuck Schumer (D-NY) announced new committee assignments for several Democratic Members, including California Senators Butler and Alex Padilla. Senator Butler will serve on the following committees:

- Judiciary
- Banking, Housing, and Urban Affairs
- Homeland Security and Governmental Affairs
- Rules and Administration

Additionally, Senator Padilla will move from the Homeland Security and Governmental Affairs Committee to the Energy and Natural Resources Committee.

Reclamation Releases Colorado River Scoping Report

The Bureau of Reclamation (Reclamation) released a Scoping Report for Post-2026 Colorado River Reservoir Operations. [The report](#) provides a summary of comments received during the public scoping process. Additionally, the report provides information on Reclamation's preliminary assessment of the proposed federal action regarding post-

2026 Colorado River operations, purpose and need, and the scope of environmental analysis to be included in the draft environmental assessment statement.

DOI Releases SEIS for Near-Term Operations of the Colorado River

The Department of the Interior (DOI) and Reclamation released the [draft Supplemental Environmental Impact Statement \(SEIS\)](#) for near-term operations of the Colorado River. The initial draft that was released in April indicated that severe options may need to be pursued due to drought conditions and forecasts, but this revised draft indicates that sticking with the current management plan is now an option. This change is due to the level of winter snowpack and spring runoff that have resulted in raised levels in both Lake Mead and Lake Powell, stating in the report that “Hydrology in the Colorado River Basin has improved compared with the hydrology at the time the SEIS analysis began.” Comments on the draft SEIS are due December 12th.

House Democrats Introduce Bill to Clarify Scope of Clean Water Act

A group of over 100 Democratic House Members, led by House Transportation and Infrastructure Committee Ranking Member Rick Larsen (D-WA), introduced the *Clean Water Act of 2023* ([H.R. 5983](#)). The bill would clarify the scope of protected water resources under the Clean Water Act (CWA) and codify permitting exemptions for agricultural, mining and construction, and waste treatment activities along with artificial features. The legislation would provide the Environmental Protection Agency (EPA) and the U.S. Army Corps of Engineers (USACE) with the authority to periodically review CWA exemptions and make necessary changes. The introduction of this legislation follows the Supreme Court decision in *Sackett v. EPA* that resulted in a revision of the Waters of the United States rule.

House Members Introduce Low-Income Household Water Assistance Program Funding Bill

Representatives Debbie Dingell (D-MI), Rashida Tlaib (D-MI), and Lisa Blunt-Rochester (D-DE) introduced legislation that would provide additional funding for the Low-Income Household Water Assistance Program (LIHWAP). The bill, entitled the *Water Access Act* ([H.R. 5793](#)), would provide \$500 million in appropriations for the program for Fiscal Year 2024. The LIHWAP program was created by the American Rescue Plan Act in 2021 to assist households with low incomes in paying arrearages and rates charged to the household for drinking water and/or wastewater services.

Federal Funding Opportunities & Announcements

EPA Announces \$128 Million in Environmental Justice Grants. EPA awarded \$128 million for 186 projects through the Environmental Justice Government-to-Government (EJG2G) Program and the Environmental Justice Collaborative Problem Solving (EJCPS) Program. The agency selected 88 EJG2G recipients to receive \$84.7 million to support state, local, territorial, and tribal government partnerships with community-based organizations focused on environmental or public health impacts in environmental justice

(EJ) communities. EPA selected 98 EJCS recipients to receive \$43.3 million to support projects that focus on EJ community resilience, revitalization, and emergency preparedness. The list of EJG2G recipients can be found [HERE](#) and the list of EJCS recipients can be found [HERE](#).

Federal Permitting Improvement Steering Council Announces \$155 Million for Federal Agency Permitting Review Efficiency and Effectiveness. The Federal Permitting Improvement Steering Council announced \$155 million in funding for federal agencies to improve the efficiency and effectiveness of infrastructure permitting review and authorizations. The funding will support streamlining the permitting process for renewable energy generation, broadband, semiconductor facilities, and electric transmission projects. The list of federal agencies receiving assistance can be found [HERE](#).

FEMA Releases \$1 Billion Building Resilient Infrastructure and Communities NOFO. The Federal Emergency Management Agency (FEMA) released a \$1 billion Notice of Funding Opportunity (NOFO) for the Building Resilient Infrastructure and Communities program. This program funds hazard mitigation projects. Applications are due February 29th and more information can be found [HERE](#).

Reclamation Announces \$500,000 Water Supply Forecast Rodeo Competition. Reclamation announced a \$500,000 Water Supply Forecast Rodeo competition to promote innovative methods and advancements in seasonal water supply forecasting. Teams or individuals will compete to develop water supply forecast models that predict seasonal runoff volumes at 26 sites in western states. The competition deadline is December 15th and more information can be found [HERE](#).

Federal Agency Personnel/Regulatory Announcements

DOD Releases Report on PFAS Groundwater Contamination at Installations. The Department of Defense (DOD) released a [congressionally mandated report](#) titled “Per- and Polyfluoroalkyl Substances in Groundwater.” The report found that plumes of Per- and Polyfluoroalkyl (PFAS) were found flowing from 245 out of 275 military installations and other sites near groundwater aquifers.

DOI Deputy Secretary Beaudreau Resigns. Department of the Interior (DOI) Deputy Secretary Tommy Beaudreau announced he will be leaving his position on October 31st. Beaudreau oversaw DOI implementation of the Bipartisan Infrastructure Law and Inflation Reduction Act. President Biden announced that Principal Deputy Assistant Secretary for Land and Minerals Management Laura Daniel-Davis will become acting Deputy Secretary upon Beaudreau’s departure.

EPA Withdraws Cybersecurity Mandate for Water Utilities. Last week, the EPA [announced](#) that it is withdrawing its cybersecurity mandate for water utilities. The memo entitled “[Addressing Public Water System Cybersecurity in Sanitary Surveys or an Alternate Process](#),” stated that utilities would have been required to incorporate

cybersecurity into periodic audits of water systems, commonly called "sanitary surveys." Those audits are already conducted on a regular basis by water utilities, and when EPA debuted the mandate in March, regulators insisted that the request was within its authorities. In July, the 8th U.S. Circuit Court of Appeals issued a stay in favor of the trio of states, freezing the rule while litigation played out.

EPA Announces 2023 WaterSense Award Winners. EPA announced 47 awards to WaterSense partners. WaterSense is a voluntary partnership program for both a label for water-efficient products and a resource for helping save water. WaterSense partners with manufacturers, retailers and distributors, homebuilders, irrigation professionals, and utilities. The list of awards can be found [HERE](#).

EPA Publishes Final PFAS Reporting Rule. EPA published a [final rule](#) requiring reporting on PFAS to the Toxics Release Inventory. The rule eliminates an exemption that allowed facilities to avoid reporting use of small concentrations of PFAS chemicals. The final rule is effective November 13th.

EPA Proposes Trichloroethylene Ban. EPA published a proposal under the Toxic Substances Control Act (TSCA) to ban all uses of trichloroethylene (TCE). TCE is currently used cleaning and furniture care products, degreasers, break cleaners, and tire repair sealants. The chemical is known to cause health risks such as cancer, neurotoxicity, and reproductive toxicity. Comments are due December 15th and more information can be found [HERE](#).

EPA Releases 2022 GHG Reporting Program Data. EPA released 2022 [greenhouse gas \(GHG\) data](#) collected under the agency's GHG Reporting Project. EPA collected data from over 8,100 industrial facilities.

EPA Releases Food Waste Reports. EPA published two new reports quantifying methane emissions from landfilled food waste and updating recommendations for managing wasted food:

- [Quantifying Methane Emissions from Landfilled Food Waste](#)
- [From Field to Bin: The Environmental Impacts of U.S. Food Waste Management Pathways](#)

EPA Releases Public Engagement Guide for State and Local Governments. EPA published a [guide](#) for state and local governments titled "Capacity Building Through Effective Meaningful Management." The guide includes tips for conducting outreach and reaching community consensus.

IRS Publishes NPRM for the Transfer of Clean Vehicle Credits. The Internal Revenue Service (IRS) published a [NPRM](#) that provides guidance regarding certain clean vehicle credits. The proposed regulations would provide guidance for taxpayers who purchase qualifying previously owned clean vehicles or purchase qualifying new clean vehicles and intend to transfer the amount of any previously owned clean vehicle credit or new clean vehicle credit to dealers who are entities eligible to receive advance payments of either credit. The proposed regulations would also provide guidance for dealers to become

eligible entities to receive advance payments of previously owned clean vehicle credits or new clean vehicle credits, and rules regarding recapture of the credits. The proposed regulations would affect taxpayers intending to transfer previously owned clean vehicle or new clean vehicle credits and eligible entities to whom the credits are transferred, as well as taxpayers who purchased previously owned clean vehicles or new clean vehicles in the event the vehicles cease being eligible for the credits. Finally, the proposed regulations provide guidance on the meaning of three new definitions added to the exclusive list of “mathematical or clerical errors” relating to certain assessments of tax without a notice of deficiency. Comments are due December 11th.

IRS Updates Commercial Clean Vehicle Credits FAQs. IRS updated its [frequently asked questions](#) (FAQs) related to new, previously owned, and qualified commercial clean vehicle credits.

##

APPENDIX C – Public Affairs Information



CVWC Digital Marketing Report

Website, Social, and Marketing Performance

October, 2023

by Hunter | Johnsen

Google Ads Campaigns

 DISPLAY AD IMPRESSIONS
CV WATER COUNTS

52,343

 SEARCH AD IMPRESSIONS
CV WATER COUNTS

1,039

 VIDEO IMPRESSIONS
CV WATER COUNTS

106,499

 CLICKS
CV WATER COUNTS

1,016


 CTR
CV WATER COUNTS

0.64%

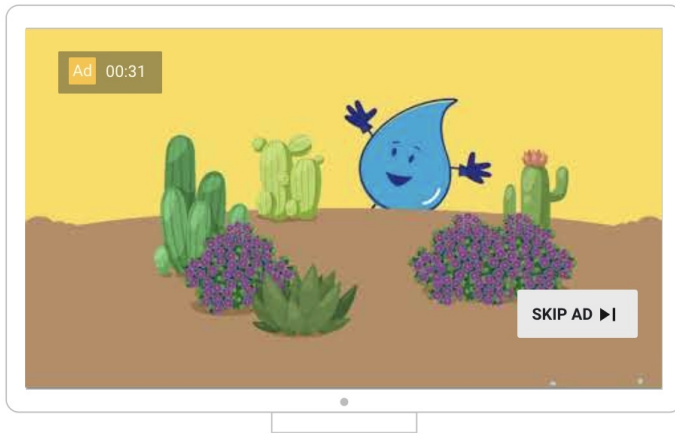
 GOOGLE PROGRAMMATIC DISPLAY AD CAMPAIGN PERFORMANCE
CV WATER COUNTS

Account name	Clicks	Impr.
CV Water Counts	482	52,343
	482	52,343



 GOOGLE YOUTUBE VIDEO AD CAMPAIGN PERFORMANCE
CV WATER COUNTS

Account name	Impr.	Engagements	Video views	Clicks
CV Water Counts	106,499	40,309	16,540	376
CVWC Water Saving Tips YouTube Spanish October 2023	45,322	19,889	10,463	119
CVWC Water Saving Tips English YouTube Oct 2023	61,177	20,420	6,077	257
	106,499	40,309	16,540	376



GOOGLE ADS PAID SEARCH CAMPAIGN PERFORMANCE
CV WATER COUNTS


Campaign	Clicks	Impr.
CVWC Search Campaigns	158	1,039
	158	1,039

ACCOUNT NAME PERFORMANCE
CV WATER COUNTS

Account name	Clicks	Impr.	CTR
CV Water Counts	120	678	17.7%
water rebate program	58	209	27.75%
grass removal rebate	15	52	28.85%
water service	13	141	9.22%
toilet rebate	13	24	54.17%
water company	7	61	11.48%
water agency	7	135	5.19%
washing machine rebate	4	17	23.53%
save water	2	25	8%
irrigation controller rebates	1	3	33.33%
the water company	0	11	0%
	120	689	17.42%

Facebook Ad Campaigns

FACEBOOK AD PERFORMANCE HUNTER JOHNSEN

Ad preview	Link Clicks	Impr.	Reach	Frequency	Page engagement
 <p>CVWC - Water During Non-Daylight Oct 2... www.instagram.com Water your yard during non-daylight hours. More water will reach the roots, and less water will evaporate. For more water-saving tips, visit CVWaterCounts.com/conservation-tips. #WaterWiseWednesday</p>	619	93,664	31,968	2.93	622
	619	93,664	31,968	2.93	622

Website Information

USERS
CV WATER - CV WATER COUNTS - GA4

1,791

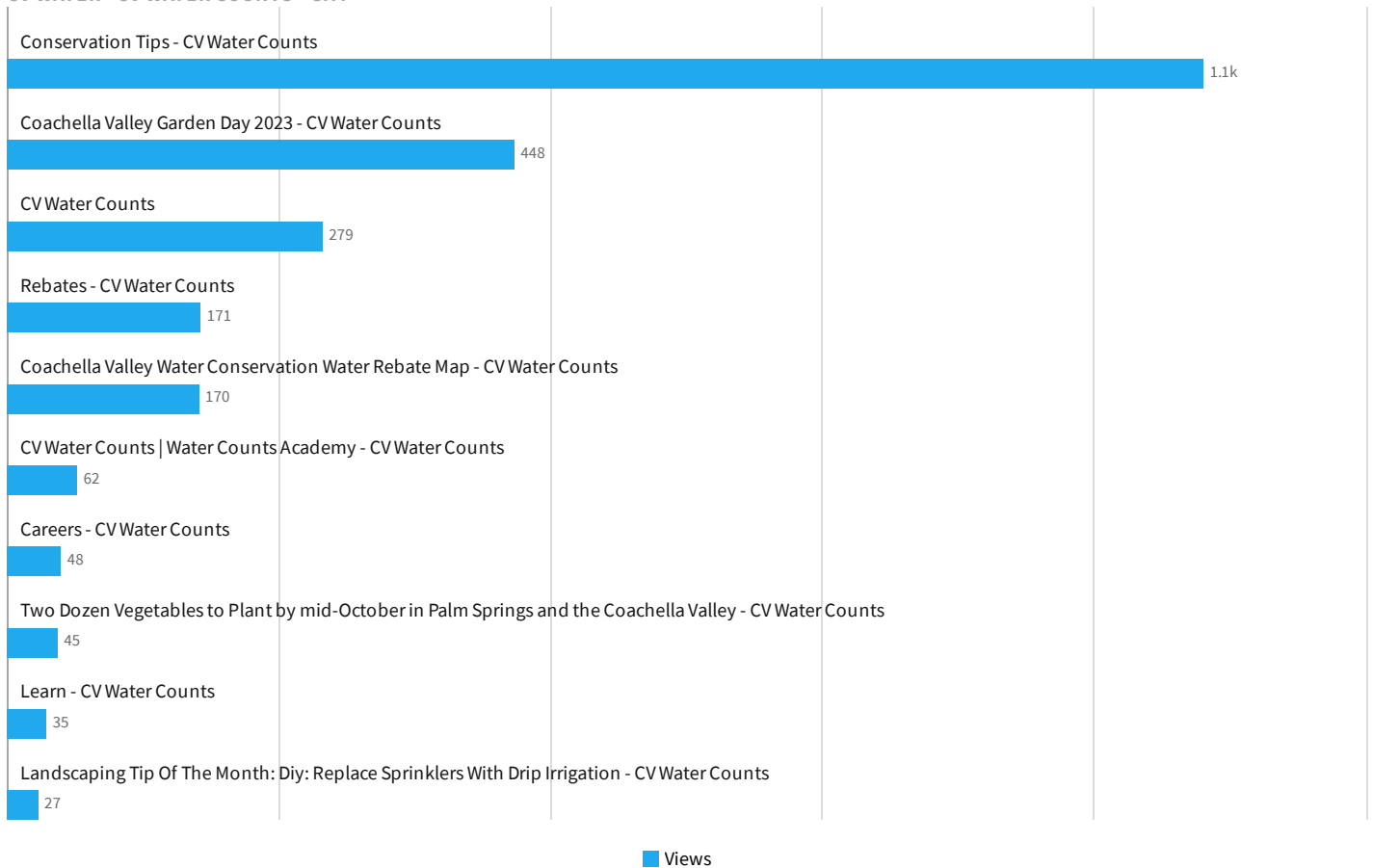
SESSIONS
CV WATER - CV WATER COUNTS - GA4

2,262

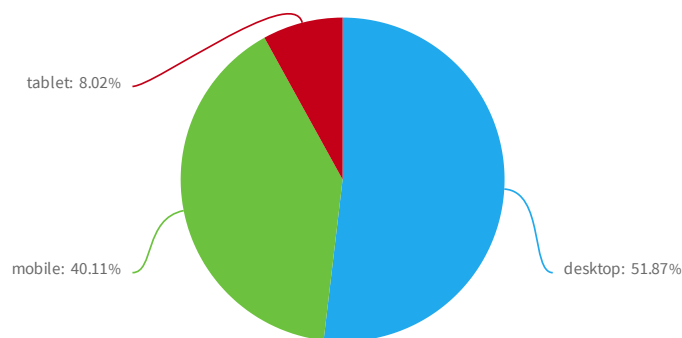
PAGEVIEWS
CV WATER - CV WATER COUNTS - GA4

2,794

VIEWS BY PAGE TITLE AND SCREEN CLASS
CV WATER - CV WATER COUNTS - GA4

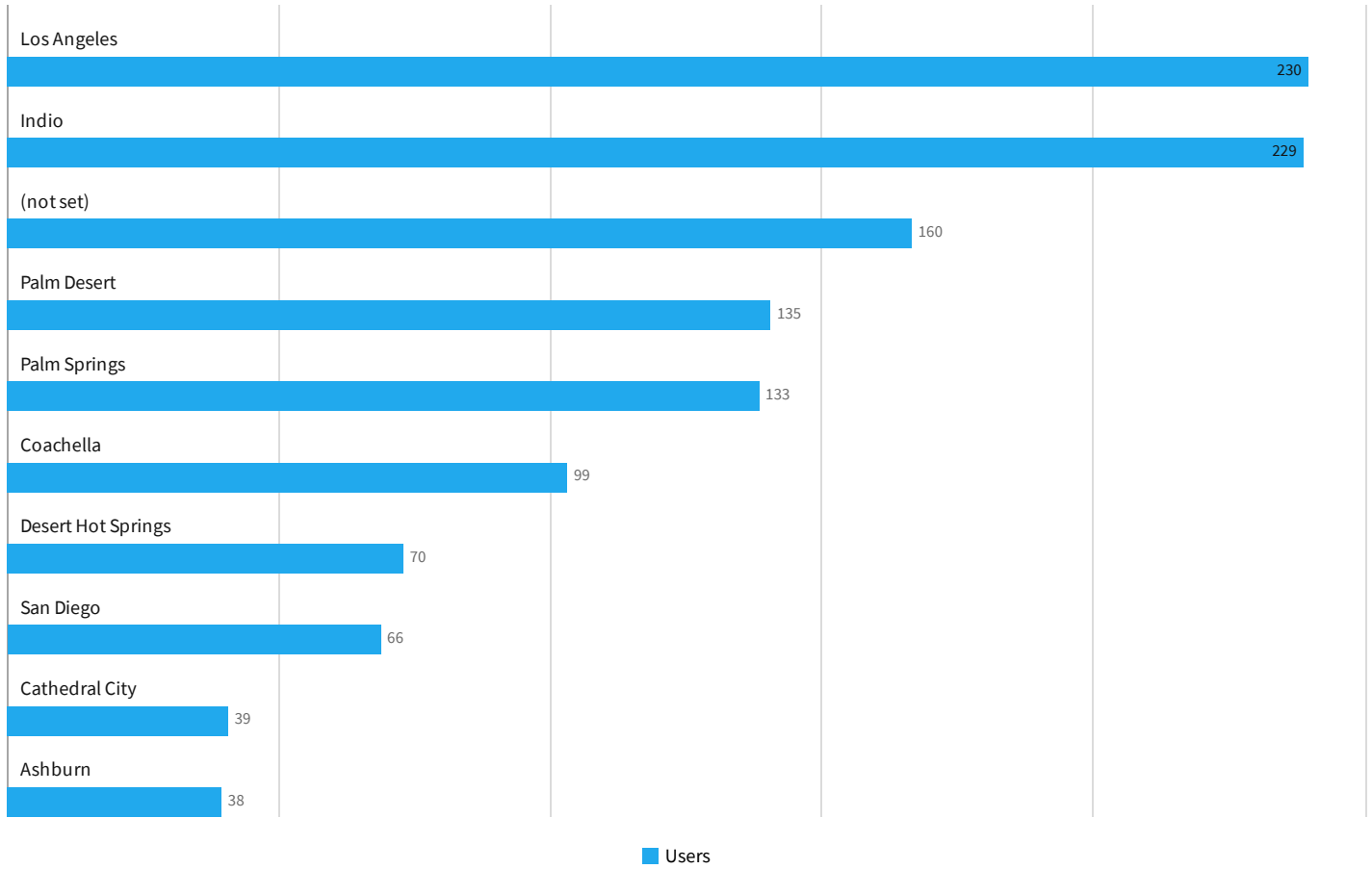


ENGAGED SESSIONS BY DEVICE CATEGORY
CV WATER - CV WATER COUNTS - GA4



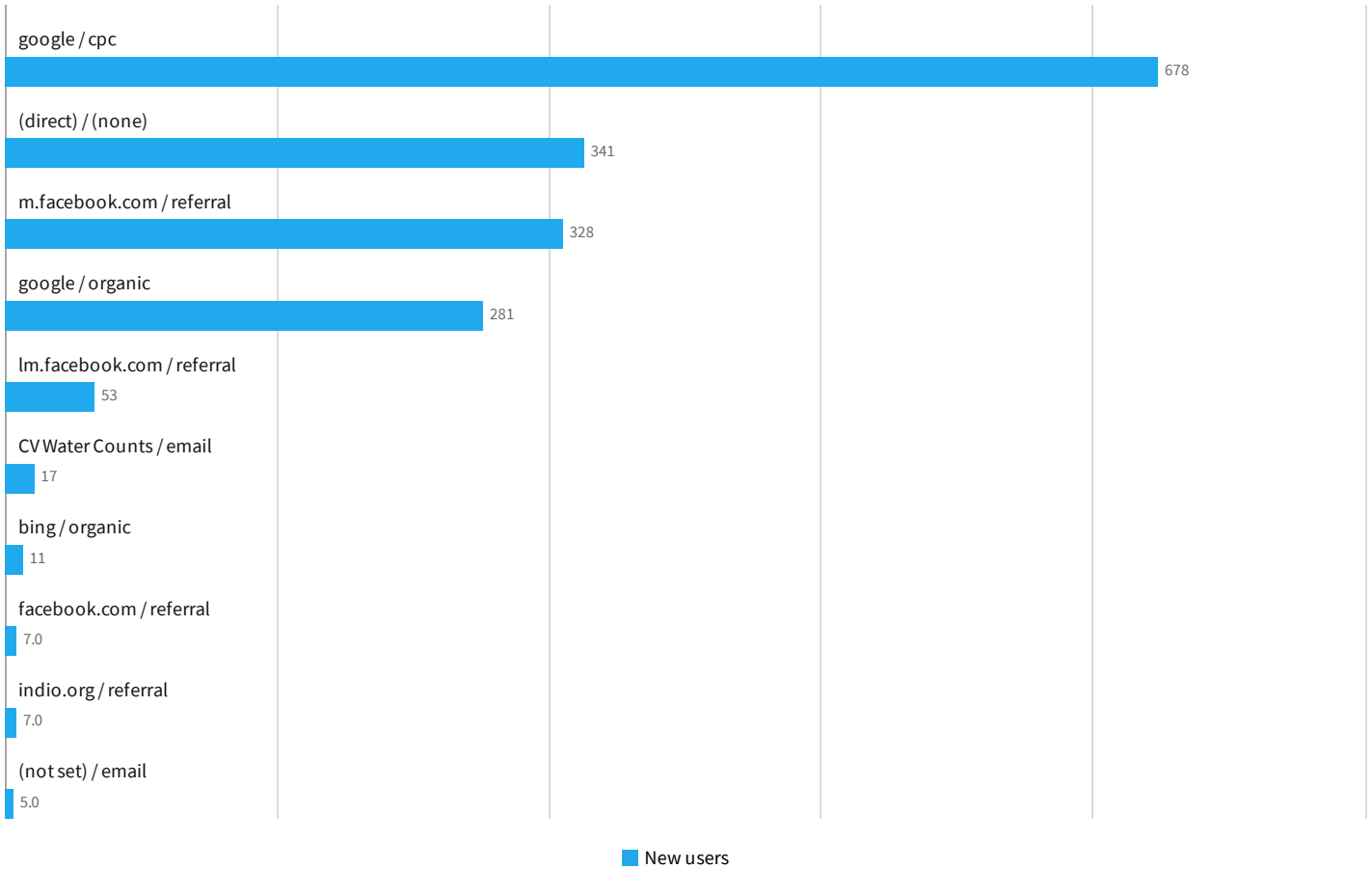
USERS BY CITY

CV WATER - CV WATER COUNTS - GA4



NEW USERS BY FIRST USER SOURCE / MEDIUM

CV WATER - CV WATER COUNTS - GA4



MONTH PERFORMANCE

PAST 6 MONTHS: CV WATER - CV WATER COUNTS - GA4

Month	New users	Engaged sessions	Engagement rate	Sessions per User	Average engagement time	Conv.
October 2023	1,751	562	24.8%	1.26	15s	105
September 2023	1,806	814	28.2%	1.56	16s	198
August 2023	1,711	611	24.6%	1.43	17s	5
July 2023	1,965	632	25.2%	1.28	15s	0
June 2023	19	4	19.0%	1.17	15s	0
May 2023	0	0	0.0%	0	0s	0
	7,252	2,629	25.7%	1.42	16s	308

Organic Search

QUERY PERFORMANCE

CVWATERCOUNTS.COM/

Query	Impr.	Clicks	CTR	Avg. position
water pledge	966	0	0%	7.12
lake cahuilla	898	0	0%	11.44
cv water	398	2	0.5%	5.41
indio water authority	213	0	0%	11.11
chaparral sage	199	0	0%	8.66
myoma water	183	0	0%	3.8
lantana ground cover	179	0	0%	6.91
spotlight cv	178	0	0%	56.8
water professionals appreciation week 2023	151	1	0.66%	4.85
mission springs water district	130	0	0%	12.98
	3,495	3	0.09%	12.91

PAGE PERFORMANCE

CVWATERCOUNTS.COM/

Page	Impr.	Clicks	CTR	Avg. position
https://cvwatercounts.com/save-water-pledge/	1,837	2	0.11%	5.76
https://cvwatercounts.com/lake-cahuilla-recreation-and-reliability/	1,601	6	0.37%	12.44
https://cvwatercounts.com/plant-of-the-month-trailing-lantana-lantana-montevideensis/	1,390	11	0.79%	19.98
https://cvwatercounts.com/	808	19	2.35%	14.95
https://cvwatercounts.com/eco-friendly-car-washes-in-the-coachella-valley/	783	1	0.13%	44.27
https://cvwatercounts.com/plant-of-the-month-prickly-pear-cactus-opuntia/	587	0	0%	15.85
https://cvwatercounts.com/plant-of-the-month-cleveland-sage-chaparral-sage-salvia-clevelandii/	563	2	0.36%	11.16
https://cvwatercounts.com/plant-of-the-month-desert-carpet-acacia-redolens/	500	4	0.8%	10.76
https://cvwatercounts.com/academy/	416	4	0.96%	15.69
https://cvwatercounts.com/faqs/water-question/	415	0	0%	7.5
	8,900	49	0.55%	15.83

Facebook Information

f IMPR.
CV WATER COUNTS

91,167

f REACH
CV WATER COUNTS

30,937

f NEW PAGE LIKES
CV WATER COUNTS

0

f ENGAGED USER
CV WATER COUNTS

627





f TOTAL PAGE VIEWS
CV WATER COUNTS







74







f PAGE LIKES
CV WATER COUNTS





3,995

f POST PERFORMANCE
CV WATER COUNTS

Post	Created at	Post reach	Post engaged users	Post engagement rate	Likes	Comments
 <p>Happy Halloween!</p>	October 31, 2023	120	8	7%	7	0
 <p>Coming Soon - the CV ...</p>	October 30, 2023	69	5	7%	3	0
 <p>The Palm Desert Golf C...</p>	October 29, 2023	108	5	5%	5	0
 <p>Desert Water Agency w...</p>	October 28, 2023	32	4	13%	4	0
		31,377	663	2%	60	0

Post	Created at	Post reach	Post engaged users	Post engagement rate	Likes	Comments
 <p>Unless you have a sma...</p>	October 26, 2023	45	2	4%	2	0
 <p>CV Water Counts is wit...</p>	October 23, 2023	55	5	9%	3	0
 <p>Drip irrigation is an opt...</p>	October 23, 2023	27	2	7%	2	0
	October 21, 2023	16	2	13%	2	0
 <p>CV Water Counts is wit...</p>	October 21, 2023	18	3	17%	2	0
 <p>From the first drip of t...</p>	October 20, 2023	14	2	14%	2	0
		31,377	663	2%	60	0

Post	Created at	Post reach	Post engaged users	Post engagement rate	Likes	Comments
 <p>This yearly event is org...</p>	October 20, 2023	39	2	5%	2	0
 <p>Learn more about Oct...</p>	October 19, 2023	67	4	6%	4	0
 <p>Keep a jug of drinking ...</p>	October 19, 2023	80	2	3%	2	0
 <p>This coming Saturday ...</p>	October 16, 2023	110	6	5%	4	0
 <p>If you or someone you...</p>	October 14, 2023	31	2	6%	2	0
 <p>Water your yard in the ...</p>	October 12, 2023	39	3	8%	3	0
		31,377	663	2%	60	0

Post	Created at	Post reach	Post engaged users	Post engagement rate	Likes	Comments
 <p>Monitor your monthly ...</p>	October 12, 2023	42	3	7%	2	0
 <p>Water is a precious and...</p>	October 9, 2023	16	2	13%	2	0
 <p>Water your yard durin...</p>	October 3, 2023	30,275	599	2%	5	0
 <p>When it's time for a car ...</p>	October 2, 2023	102	2	2%	2	0
		31,377	663	2%	60	0

Instagram Information

 **IMPRESSIONS**
CV WATER COUNTS

5,234



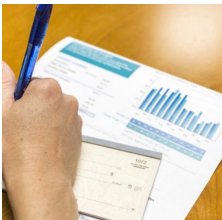


 **LIKES**
CV WATER COUNTS

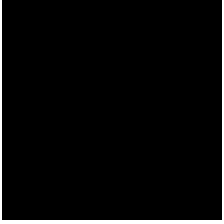
15

 **FOLLOWERS (LIFETIME)**
CV WATER COUNTS

233

 **MEDIA PERFORMANCE**
CV WATER COUNTS

Media	Impr.	Engagement	Reach	Saved	Video views
 <p>Save water: Water your yard during non-daylight hours</p> <p><i>Water</i> COUNTS</p> <p>Water your yard durin...</p>	23	3	20	0	0
 <p>When it's time for a car ...</p>	16	2	10	0	0
 <p>Monitor your monthly ...</p>	14	2	12	0	0
 <p>The Palm Desert Golf C...</p>	12	4	12	0	0
 <p>Happy Halloween!</p>	7	2	6	0	0
	72	13	77	0	20

Media	Impr.	Engagement	Reach	Saved	Video views
	0	0	17	0	20
Water your yard in the ...	72	13	77	0	20

Twitter Information

Twitter analytics are currently limited (see below)

We're working on improvements to analytics.twitter.com. In the meantime, you may see some metrics are missing. You can access your Tweet Analytics and download reports [here](#). You can try the new version of account analytics beta [here](#).

28 day summary with change over previous period

Tweet impressions
214 ↑40.8%

Followers
396 ↑1



E-Blast Information

📧 CAMPAIGN PERFORMANCE CV WATER COUNTS

Campaign	Send Time	Emails Sent	Total Opens	Open Rate	Industry Open Rate	Total Clicks	Click Rate	Industry Click Rate	Hard Bounces	Unsubscribe Count
CV Water Counts October 2023	Wednesday, October 4, 2023 8:00 PM	564	583	57.27%	17.49%	30	3.55%	0.86%	0	3
		564	583	57.27%	17.49%	30	3.55%	0.86%	0	3



MSWD Digital Marketing & Website Report

Website, Social, and Marketing Performance

October, 2023

Casey Dolan

Casey Dolan Consulting

Google Ads Campaigns

IMPRESSIONS
MSWD

87,281

CLICKS
MSWD

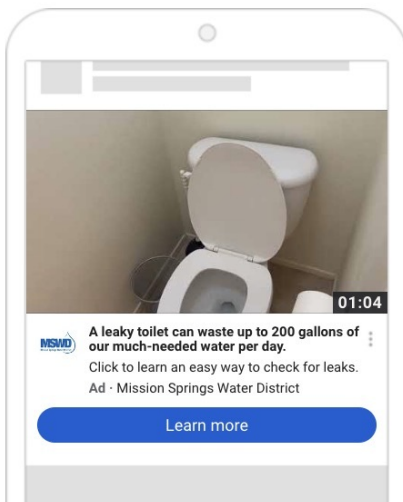
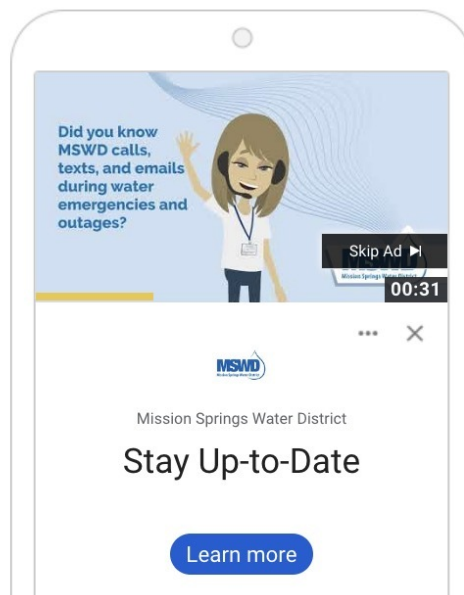
640

CTR
MSWD

0.73%

GOOGLE ADS CAMPAIGN PERFORMANCE
MSWD

Ad group	Impr.	Clicks	CTR
Update Contact Info	23,358	332	1.42%
MSWD Toilet Tank Video 2023	22,739	275	1.21%
MSWD Calendar Contest	41,184	33	0.08%
	87,281	640	0.73%



Facebook Ad Campaigns

Includes ad campaign information for all campaigns, excluding anniversary event

AD PERFORMANCE

MSWD

Ad	Link Clicks	Impr.	Reach	Page Likes
MSWD Calendar Contest	161	19,839	5,059	0
MSWD Toilet Repair Month - Oct 2023	52	9,583	2,706	0
MSWD Update Contact Info Video Oct 2023	49	30,828	17,019	0
	262	60,250	21,798	0

MSWD Mission Springs Water District Sponsored

Did you know MSWD calls, texts, and emails customers during water emergencies and outages? That's why it's important ...See more



mswd.org
Update Your Contact Information [Learn more](#)

Like Comment Share

MSWD Mission Springs Water District Sponsored

Our Calendar Contest is now open!

Twelve winners will have their ...See more

Calendar Contest Now Open!



Win up to **\$150 in prizes** **MSWD** Mission Springs Water District

mswd.org
MSWD Calendar Contest Now Open! [Learn more](#)

Like Comment Share

MSWD Mission Springs Water District
Published by Casey Dolan · October 6 at 5:51 PM

October is National Toilet Tank Repair Month.

A leaky toilet isn't just a nuisance, it can also waste up to 200 gallons of our much-needed water per day! The simplest way to find toilet leaks is by adding a drop of food coloring in the toilet tank. If you see color in your toilet bowl after 5 minutes, you know there is a leak. Some toilets also continue to run long after flushing.

Toilet problems are usually caused by a faulty fill valve or flapper. You can stop leaks by purchasing a toilet repair kit. Kits are found at most home improvement stores or purchased online. They are inexpensive and instructions are easy to follow.



MSWD.ORG
True Water Crimes - The case of the leaky toilet flapper [Learn more](#)

Website Information

Note: New Google Analytics GA4 tracking enabled on 7/10, with information below from 7/10-7/31.

USERS

WWW.MSWD.ORG - HTTP://WWW.MSWD.O...

5,450

VIEWS

WWW.MSWD.ORG - HTTP://WWW.MSWD.O...

18,281

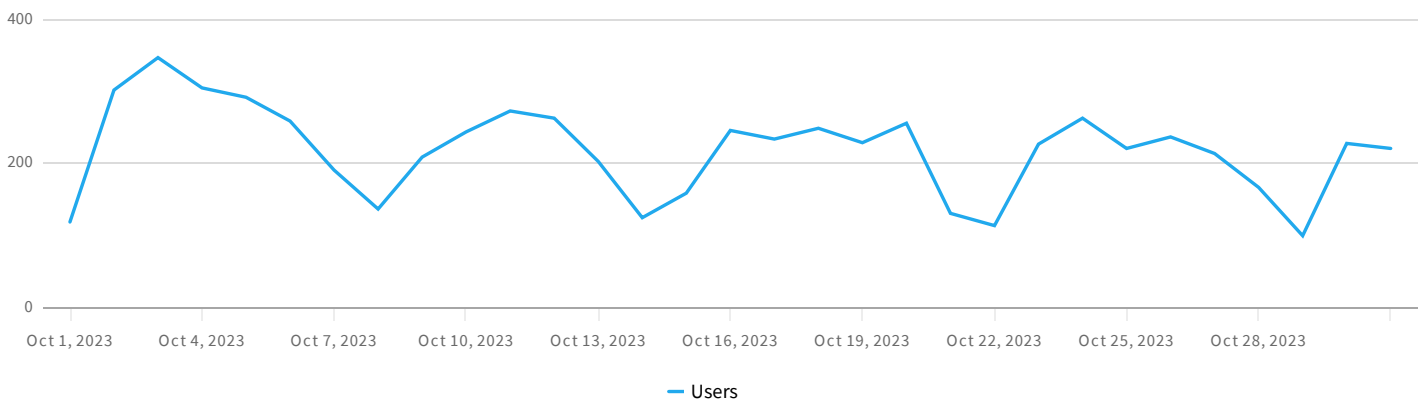
ENGAGED SESSIONS

WWW.MSWD.ORG - HTTP://WWW.MSWD.O...

5,638

USERS BY DAY

WWW.MSWD.ORG - HTTP://WWW.MSWD.ORG - GA4

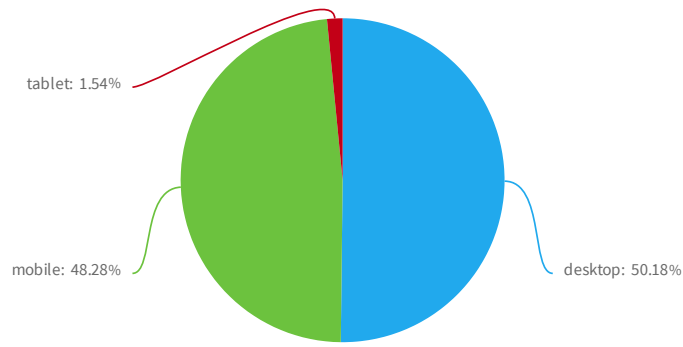


PAGE TITLE PERFORMANCE

WWW.MSWD.ORG - HTTP://WWW.MSWD.ORG - GA4

Page Title	Views	Views per user	Users	Engaged sessions	Sessions per User	Average engagement time
Mission Springs Water District Home Page Mission Springs Water District CA	4,749	1.54	3,078	3,810	1.37	16s
New Customer Portal Mission Springs Water District CA	3,748	1.54	2,413	2,930	1.38	15s
Job Opportunities Mission Springs Water District CA	1,021	2.76	367	460	1.64	22s
Bill Pay Options Mission Springs Water District CA	722	1.36	525	485	1.21	20s
Careers Mission Springs Water District CA	445	1.7	260	343	1.46	23s
Home Page Mission Springs, CA Water District	389	1.58	246	270	1.2	18s
Application for Water Service Mission Springs Water District CA	313	2.28	136	170	1.54	4m 8s
Video: True Water Crimes - The case of the leaky toilet flapper Mission Springs Water District CA	269	1.17	223	60	1.11	8s
Upcoming Meetings Mission Springs Water District CA	265	2.73	96	167	2.1	33s
Search Mission Springs Water District CA	261	2.27	115	129	1.17	41s
	18,281	3.31	5,450	5,638	1.5	58s

ENGAGED SESSIONS BY DEVICE CATEGORY
 WWW.MSWD.ORG - HTTP://WWW.MSWD.ORG - GA4

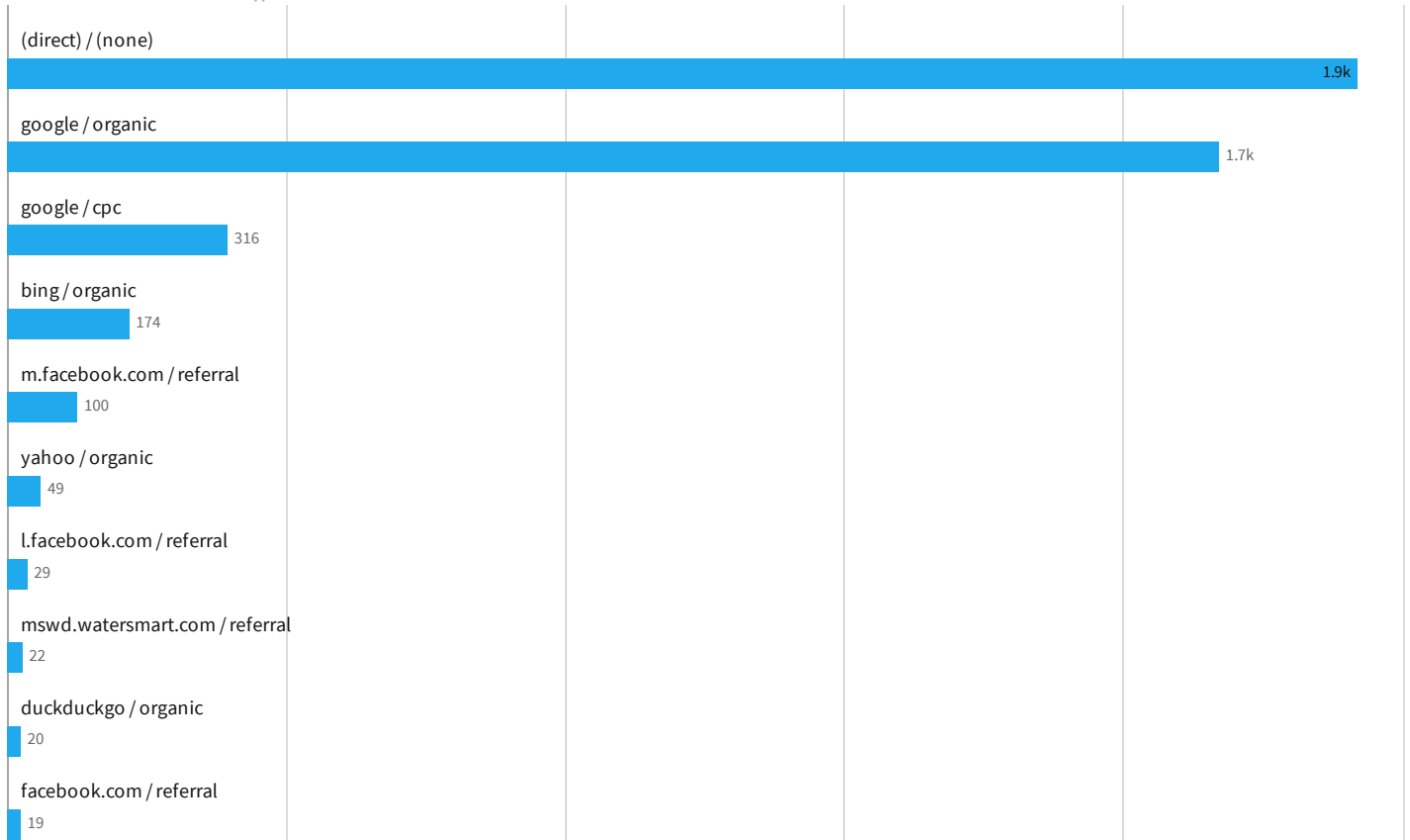


USERS BY CITY
 WWW.MSWD.ORG - HTTP://WWW.MSWD.ORG - GA4

City	Users
Desert Hot Springs	1,276
Los Angeles	935
(not set)	633
Indio	208
San Diego	207
Palm Springs	149
La Quinta	141
Palm Desert	85
Cathedral City	42
Ashburn	42
	5,450

NEW USERS BY FIRST USER SOURCE / MEDIUM

WWW.MSWD.ORG - HTTP://WWW.MSWD.ORG - GA4



■ New users




MSWD Social Analytics Report

Facebook Account Overview (October 1 - 31, 2023)




<p>Posts Published</p> <p style="font-size: 24px; font-weight: bold;">19</p> <p style="font-size: 12px; color: green;">+4 26.7%</p>	<p>Total Likes</p> <p style="font-size: 24px; font-weight: bold;">1,225</p> <p style="font-size: 12px; color: red;">-1 -0.1%</p>	<p>New Likes</p> <p style="font-size: 24px; font-weight: bold;">1</p> <p style="font-size: 12px; color: red;">-2 -66.7%</p>	<p>Unlikes</p> <p style="font-size: 24px; font-weight: bold;">1</p> <p style="font-size: 12px; color: red;">-3 -75.0%</p>	<p>Engaged People</p> <p style="font-size: 24px; font-weight: bold;">518</p> <p style="font-size: 12px; color: red;">-361 -41.1%</p>
<p>Total Reach</p> <p style="font-size: 24px; font-weight: bold;">40,740</p> <p style="font-size: 12px; color: red;">-17,780 -30.4%</p>	<p>Organic Reach</p> <p style="font-size: 24px; font-weight: bold;">3,031</p> <p style="font-size: 12px; color: red;">-344 -10.2%</p>	<p>Paid Reach</p> <p style="font-size: 24px; font-weight: bold;">37,846</p> <p style="font-size: 12px; color: red;">-17,723 -31.9%</p>	<p>Impressions</p> <p style="font-size: 24px; font-weight: bold;">54,320</p> <p style="font-size: 12px; color: red;">-35,483 -39.5%</p>	<p>Video Views</p> <p style="font-size: 24px; font-weight: bold;">11,399</p> <p style="font-size: 12px; color: green;">+9,051 385.5%</p>

3 Most Engaging Posts	3 Highest Reach Posts	3 Most Shared Posts
<div style="display: flex; align-items: flex-start;"> <div> <p>Water Professionals Week</p> <p>🔹 Celebrating Water Professionals Week, MSWD would like to...</p> <p style="text-align: right; font-weight: bold;">17.33%</p> </div> </div>	<div style="display: flex; align-items: flex-start;"> <div> <p>There's still time to enter! The MSWD Calendar Drawing Co...</p> <p style="text-align: right; font-weight: bold;">635</p> </div> </div>	<div style="display: flex; align-items: flex-start;"> <div> <p>There's still time to enter! The MSWD Calendar Drawing Co...</p> <p style="text-align: right; font-weight: bold;">8</p> </div> </div>
<div style="display: flex; align-items: flex-start;"> <div> <p>Water Professionals Week</p> <p>🔹 As we move forward with Water Professionals Week, today ...</p> <p style="text-align: right; font-weight: bold;">15.87%</p> </div> </div>	<div style="display: flex; align-items: flex-start;"> <div> <p>Proud Supporter! The Friends of the DHS Library Book Sale...</p> <p style="text-align: right; font-weight: bold;">235</p> </div> </div>	<div style="display: flex; align-items: flex-start;"> <div> <p>Water Professionals Week</p> <p>🔹 October 7-15, 2023 is Water Professionals Appreciation W...</p> <p style="text-align: right; font-weight: bold;">1</p> </div> </div>
<div style="display: flex; align-items: flex-start;"> <div> <p>Water Professionals Week</p> <p>🔹 October 7-15, 2023 is Water Professionals Appreciation W...</p> <p style="text-align: right; font-weight: bold;">14.37%</p> </div> </div>	<div style="display: flex; align-items: flex-start;"> <div> <p>Worker Wed Replacing Valve</p> <p>👤 💧 ❤️ Hats off to our field crews! The MSWD team works t...</p> <p style="text-align: right; font-weight: bold;">224</p> </div> </div>	<div style="display: flex; align-items: flex-start;"> <div> <p>Water Professionals Week</p> <p>🔹 As we near the end of Water Professionals Week, today we...</p> <p style="text-align: right; font-weight: bold;">1</p> </div> </div>




3 Least Engaging Posts

	Breast Cancer Awareness Month ♥ MSWD is proud to stand alongside the global community in...	2.94%
	Proud Supporter! The Friends of the DHS Library Book Sale...	2.98%
	There's still time to enter! The MSWD Calendar Drawing Co...	3.62%

3 Lowest Reach Posts

	In case you missed it, yesterday was National Mammography...	41
	Regional Plat Update 🚧👷 Construction update! Work on the Nancy Wright Region...	41
	Day Without Water What if you had to go a day without water? For millions o...	53

3 Least Shared Posts

	Halloween Hydration 🎃 Trick or Treaters, don't let dehydration spook your Hall...	0
	New Hire Please help us welcome Andrea Varela, who is joining MSWD...	0
	Join us for Water 101 💧 Let the water knowledge flow! Sign up now for Water 101...	0

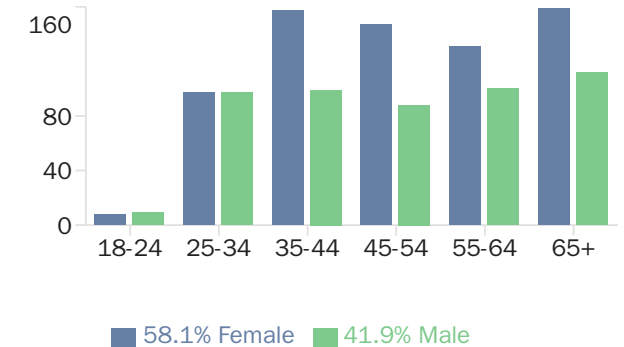
Likes By Country

1. United States of America (1,191 likes)
2. Mexico (15 likes)
3. France (4 likes)
4. Canada (4 likes)
5. Sierra Leone (1 like)

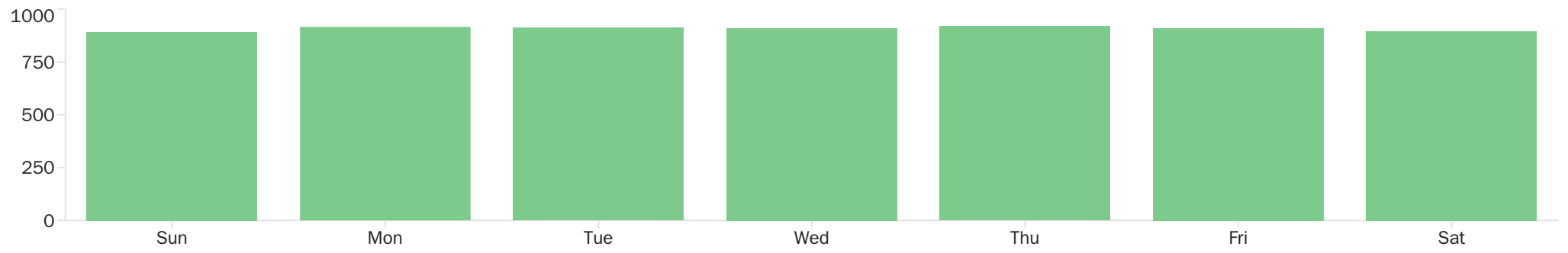
Likes By City

1. Desert Hot Springs, CA (559 likes)
2. Indio, CA (68 likes)
3. Cathedral City, CA (51 likes)
4. La Quinta, CA (50 likes)
5. Palm Springs, CA (49 likes)







Likes by age & gender




















Days your fans are online















Facebook Post Metrics (October 1 - 31, 2023)





Date	Format	Post	Labels	Reach	Engaged Users	Engagement Rate	Reactions	Comments	Shares	Clicks	Video Views
October 31, 2023 4:10 PM PDT	 Image	 <p>Halloween Hydration 🎃 Trick or Treaters, don't let dehydration spook your Halloween fun! 🎃 As you embark on your hauntingly delightful trick-or-treat adventure with MSWD water in hand, remember to stay as hydrated as a...</p>	Event	88	8	9.09%	6	1	0	3	0
October 30, 2023 8:35 AM PDT	 Image	 <p>New Hire Please help us welcome Arthur Cabrera, who is joining MSWD as a Business Analyst. Arthur will perform a diverse range of analytical and coordinative duties in developing technology solutions that w...</p>	New Hire / Jobs	201	20	9.95%	13	1	1	20	0
October 26, 2023 4:32 PM PDT	 Image	 <p>New Hire Please help us welcome Andrea Varela, who is joining MSWD as an Associate Engineer. Andrea will perform various civil engineering work in the research, design, and construction of our water and sew...</p>	New Hire / Jobs	179	16	8.94%	16	0	0	7	0

Date	Format	Post	Labels	Reach	Engaged Users	Engagement Rate	Reactions	Comments	Shares	Clicks	Video Views
October 24, 2023 7:47 AM PDT	 Video	 Join us for Water 101  Let the water knowledge flow! Sign up now for Water 101. Our next session is Thursday, Oct 26, focusing on the MSWD wastewater system. Sessions are held in person between 6-7 p.m. at the Desert ...	Event	70	6	8.57%	3	0	0	4	26
October 21, 2023 1:24 PM PDT	 Image	 Desert Horticultural Day This Saturday – it's Coachella Valley Garden Day from 8am to 2pm at UCR Palm Desert. To find out more, visit : https://loom.ly/pUnL_Ag	Event	128	12	9.38%	8	0	0	6	0
October 21, 2023 9:39 AM PDT	 Image	 In case you missed it, yesterday was National Mammography Day, which serves as a reminder and encouragement to women to get screened for breast cancer through receiving a mammogram. #mswdcares		41	5	12.2%	4	1	0	4	0
October 19, 2023 1:15 PM PDT	 Image	 Day Without Water What if you had to go a day without water? For millions of Americans, lack of access to clean water is a harsh reality, not something to be imagined. On October 19th, let's get loud—online and in o...	Event	53	3	5.66%	3	0	0	0	0

Date	Format	Post	Labels	Reach	Engaged Users	Engagement Rate	Reactions	Comments	Shares	Clicks	Video Views
October 18, 2023 4:47 PM PDT	 Video	 Regional Plat Update 🚧👷 Construction update! Work on the Nancy Wright Regional Water Reclamation Facility continues. Projects like this protect our groundwater and ensure we will have safe, high-quality drinking wate...	Worker Wed	41	3	7.32%	3	0	0	0	16
October 17, 2023 12:15 PM PDT	 Image	 Community Calendar 💙💧 People of all ages can work together to conserve water. Even children can help by turning off the faucet while brushing their teeth. Just ask Joziah D. from Julius Corsini Elementary School, who...	Event	60	5	8.33%	4	0	0	1	0
October 14, 2023 10:26 AM PDT	 Image	 Proud Supporter! The Friends of the DHS Library Book Sale and Opportunity Drawing will continue today, Saturday, Oct. 14, 10 am- 5 pm. Many books are like new and great for presents. Buy a bag of b...		235	7	2.98%	7	1	1	2	0
October 13, 2023 5:22 PM PDT	 Image	 Water Professionals Week 💧 As we near the end of Water Professionals Week, today we would like to honor Lisa Pelton, Customer Service Representative II. As a lifelong resident of Desert Hot Springs, Lisa Pelton has a spec...	Event	191	20	10.47%	15	0	1	10	0







Date	Format	Post	Labels	Reach	Engaged Users	Engagement Rate	Reactions	Comments	Shares	Clicks	Video Views
October 12, 2023 2:47 PM PDT	 Image	 <p>Water Professionals Week Celebrating Water Professionals Week, MSWD would like to highlight Jason Weekley, Lead Field Operations Technician. According to Jason, every day is an opportunity to learn something new. As part ...</p>	Event	132	16	12.12%	14	0	0	5	0
October 11, 2023 2:38 PM PDT	 Image	 <p>Water Professionals Week Celebrating Water Professionals Week, MSWD would like to highlight Accounting Technician Ana Murillo. To Ana, MSWD represents one important thing—community. Being the community's water and waste...</p>	Event	75	13	17.33%	12	0	0	1	0
October 10, 2023 1:38 PM PDT	 Image	 <p>Water Professionals Week As we move forward with Water Professionals Week, today we would like to highlight David Pena Field Service Representative II. They say that everyone loves a good mystery, but a more accurate t...</p>	Event	126	20	15.87%	16	0	0	8	0

Date	Format	Post	Labels	Reach	Engaged Users	Engagement Rate	Reactions	Comments	Shares	Clicks	Video Views
October 09, 2023 4:12 PM PDT	 Image	 <p>Water Professionals Week 💧 October 7-15, 2023 is Water Professionals Appreciation Week! Celebrated by water agencies throughout the state, the week brings public awareness to the important role of water industry professiona...</p>	<div data-bbox="1032 201 1234 229" style="background-color: #f08080; border-radius: 10px; padding: 2px 5px; display: inline-block;">Event</div>	174	25	14.37%	20	1	1	16	0
October 09, 2023 1:18 PM PDT	 Image	 <p>There's still time to enter! The MSWD Calendar Drawing Contest deadline has been extended to Wednesday, October 11th. We are asking students to enter today for a chance to win prizes and have their...</p>		635	23	3.62%	22	0	8	9	0
October 04, 2023 4:53 PM PDT	 Image	 <p>Worker Wed Replacing Valve 🧑‍🔧💧💙 Hats off to our field crews! The MSWD team works to keep our water and wastewater systems operating by maintaining pipes and quickly making repairs. Show here the team is working on a valve ...</p>	<div data-bbox="1032 908 1234 936" style="background-color: #4a90e2; border-radius: 10px; padding: 2px 5px; display: inline-block;">Worker Wed</div>	224	22	9.82%	16	1	0	16	0

Date	Format	Post	Labels	Reach	Engaged Users	Engagement Rate	Reactions	Comments	Shares	Clicks	Video Views
October 02, 2023 2:59 PM PDT	 Image	 <p>Breast Cancer Awareness Month ❤️ MSWD is proud to stand alongside the global community in supporting Breast Cancer Awareness Month. Held in October each year, the month aims to promote screening and prevention of the disease, whi...</p>	Event	68	2	2.94%	2	0	0	0	0
October 01, 2023 2:44 PM PDT	 Link	 <p>Toilet Tank Repair Month 🚽💧 We highlight #NationalToiletTankRepairMonth as a reminder to check our toilets for leaks in need of repair. Fixing the flapper on your toilet is simple to do and will save water and money. Plus, ...</p>	Conservation/Reba...	70	3	4.29%	3	0	0	1	0
Total				2,791	229		187	6	12	113	42
Average				146.9	12.1	8.2%	9.8	0.3	0.6	5.9	2.2

Twitter Account Overview (October 1 - 31, 2023)

Tweets Published	Total Likes	Total Retweets	Total Followers	Following
<h1 style="margin: 0;">11</h1> <p style="margin: 0; color: green;">+6 120.0%</p>	<h1 style="margin: 0;">1</h1>	<h1 style="margin: 0;">1</h1>	<h1 style="margin: 0;">100</h1> <p style="margin: 0; color: green;">+3 3.1%</p>	<h1 style="margin: 0;">99</h1>

3 Most Retweeted Posts	3 Most Liked Posts
<div style="margin-bottom: 10px;">  <p>Regional Plat Update 🚧👷 Construction update! Work on the Nancy Wright Regional Water Reclamation Facility continues. Projects like thi... ..</p> <p style="text-align: right;">1</p> </div> <div style="margin-bottom: 10px;">  <p>Toilet Tank Repair Month 🚽💧 We highlight #NationalToiletTankRepairMonth as a reminder to check toilets for leaks in need of repair. Fixing th... ..</p> <p style="text-align: right;">0</p> </div> <div>  <p>Water Professionals Week 💧 Oct 7-15 is Water Professionals Appreciation Week! To help us celebrate, the District will share the water stories... ..</p> <p style="text-align: right;">0</p> </div>	<div style="margin-bottom: 10px;">  <p>Join us for Water 101 💧 Let the water knowledge flow! Sign up now for Water 101. Our next session is Thursday, Oct 26, between 6-7 p.m. a... ..</p> <p style="text-align: right;">1</p> </div> <div style="margin-bottom: 10px;">  <p>Toilet Tank Repair Month 🚽💧 We highlight #NationalToiletTankRepairMonth as a reminder to check toilets for leaks in need of repair. Fixing th... ..</p> <p style="text-align: right;">0</p> </div> <div>  <p>Water Professionals Week 💧 Oct 7-15 is Water Professionals Appreciation Week! To help us celebrate, the District will share the water stories... ..</p> <p style="text-align: right;">0</p> </div>

3 Least Retweeted Posts



Join us for Water 101

Let the water knowledge flow! Sign up now for Water 101. Our next session is Thursday, Oct 26, between 6-7 p.m. a...

0



Desert Horticultural Day

This Saturday – it's Coachella Valley Garden Day from 8am to 2pm at UCR Palm Desert. To find out more, visit :... https...

0



Day Without Water

What if you had to go a day without water? For millions of Americans, lack of access to clean water is a harsh real...

0

3 Least Liked Posts



Desert Horticultural Day

This Saturday – it's Coachella Valley Garden Day from 8am to 2pm at UCR Palm Desert. To find out more, visit :... https...

0



Day Without Water

What if you had to go a day without water? For millions of Americans, lack of access to clean water is a harsh real...

0




























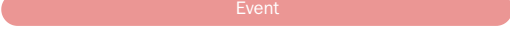
Regional Plat Update




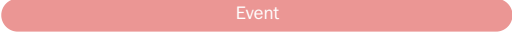








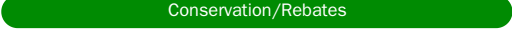
Construction update! Work on the Nancy Wright Regional Water Reclamation Facility continues. Projects like thi...

0

Twitter Post Metrics (October 1 - 31, 2023)

Date	Format	Post	Labels	Retweets	Likes
<p>October 24, 2023 7:47 AM PDT</p>	<p> Link</p>	<p> Join us for Water 101  Let the water knowledge flow! Sign up now for Water 101. Our next session is Thursday, Oct 26, between 6-7 p.m. a... https://t.co/mtxUkobSCI</p>	<p> Event</p>	<p>0</p>	<p>1</p>
<p>October 21, 2023 1:24 PM PDT</p>	<p> Link</p>	<p> Desert Horticultural Day This Saturday – it’s Coachella Valley Garden Day from 8am to 2pm at UCR Palm Desert. To find out more, visit :... https://t.co/IMwRXfq82Z</p>	<p> Event</p>	<p>0</p>	<p>0</p>
<p>October 19, 2023 1:15 PM PDT</p>	<p> Link</p>	<p> Day Without Water What if you had to go a day without water? For millions of Americans, lack of access to clean water is a harsh real... https://t.co/5ptBC0us7s</p>	<p> Event</p>	<p>0</p>	<p>0</p>
<p>October 18, 2023 4:47 PM PDT</p>	<p> Link</p>	<p> Regional Plat Update  Construction update! Work on the Nancy Wright Regional Water Reclamation Facility continues. Projects like thi... https://t.co/pqcRw33CXE</p>	<p> Worker Wed</p>	<p>1</p>	<p>0</p>


Date	Format	Post	Labels	Retweets	Likes
October 17, 2023 12:15 PM PDT	 Link	 <p>Community Calendar 💙💧 People of all ages can work together to conserve water. Even children can help by turning off the faucet while br... https://t.co/uuNG1Wlev2</p>		0	0
October 13, 2023 5:22 PM PDT	 Link	 <p>Water Professionals Week 💧 As we near the end of Water Professionals Week, today we would like to honor Lisa Pelton, Customer Service Represe... https://t.co/mpOlovgqtR</p>		0	0
October 12, 2023 2:47 PM PDT	 Link	 <p>Water Professionals Week 💧 Celebrating Water Professionals Week, MSWD would like to highlight Jason Weekley, Lead Field Operations Technician... https://t.co/a7duliHR0P</p>		0	0
October 11, 2023 2:38 PM PDT	 Link	 <p>Water Professionals Week 💧 Celebrating Water Professionals Week, MSWD would like to highlight Accounting Technician Ana Murillo. To read Ana'... https://t.co/ptADi4515s</p>		0	0

Date	Format	Post	Labels	Retweets	Likes
October 10, 2023 1:38 PM PDT	 Link	 <p>Water Professionals Week  As we move forward with Water Professionals Week, today we would like to highlight David Pena, Field Service Repre... https://t.co/gku7Z6V5la</p>		0	0
October 09, 2023 4:12 PM PDT	 Link	 <p>Water Professionals Week  Oct 7-15 is Water Professionals Appreciation Week! To help us celebrate, the District will share the water stories... https://t.co/XMyfxFHkcc</p>		0	0
October 01, 2023 2:44 PM PDT	 Link	 <p>Toilet Tank Repair Month   We highlight #NationalToiletTankRepairMonth as a reminder to check toilets for leaks in need of repair. Fixing th... https://t.co/xZKWy0FEu9</p>		0	0
Total				1	1
Average				0.1	0.1

Instagram Account Overview (October 1 - 31, 2023)


Posts Published	Total Followers	New Followers	Impressions	Reach	Profile Views
16	305	6	13,834	11,011	58
+2 14.3%	+5 1.7%	-2 -25.0%	-24,409 -63.8%	-18,663 -62.9%	-5 -7.9%

3 Most Liked Posts

- 


Worker Wed Replacing Valve

👷💧💙 Hats off to our field crews! The MSWD team works to keep our water and wastewater systems operating by maintai...

10
- 

Water Professionals Week

💧 October 7-15 is Water Professionals Appreciation Week! Celebrated by water agencies throughout the state, the week b...


8
- 

Water Professionals Week

💧 As we near the end of Water Professionals Week, today we would like to honor Lisa Pelton, Customer Service Represent...

8

3 Most Commented Posts

- 

Toilet Tank Repair Month

🚽💧 We highlight #NationalToiletTankRepairMonth as a reminder to check our toilets for leaks in need of repair. Fixing ...

0
- 

Breast Cancer Awareness Month

💖 MSWD is proud to stand alongside the global community in supporting Breast Cancer Awareness Month. Held in October e...

0
- 

Worker Wed Replacing Valve

👷💧💙 Hats off to our field crews! The MSWD team works to keep our water and wastewater systems operating by maintai...

0

3 Least Liked Posts



Halloween Hydration

🎃👤 Trick or Treaters, don't let dehydration spook your Halloween fun! 🤝🎃

1

As you embark on your hauntingly delightful...



Breast Cancer Awareness Month

❤️ MSWD is proud to stand alongside the global community in supporting Breast Cancer Awareness Month. Held in October e...

3



Regional Plat Update

🚧👷 Construction update! Work on the Nancy Wright Regional Water Reclamation Facility continues. Projects like this ...

4

3 Least Commented Posts



Halloween Hydration

🎃👤 Trick or Treaters, don't let dehydration spook your Halloween fun! 🤝🎃

0

As you embark on your hauntingly delightful...



New Hire

Please help us welcome Arthur Cabrera, who is joining MSWD as a Business Analyst. Arthur will perform a diverse range...

0



New Hire







Please help us welcome Andrea Varela, who is joining MSWD as an Associate Engineer. Andrea will perform various civil...







0




Instagram Story Metrics (October 1 - 31, 2023)




Date	Story	Labels	Exits	Impressions	Reach	Replies	Taps Forward	Taps Back
<p><i>No stories found within the selected date range.</i></p>								




Instagram Post Metrics (October 1 - 31, 2023)

Date	Format	Post	Labels	Likes	Comments	Impressions	Reach	Engagements	Engagement Rate	Saves	Video Views
October 31, 2023 4:10 PM PDT	 Image	 <p>Halloween Hydration 🎃👻 Trick or Treaters, don't let dehydration spook your Halloween fun! 🍷🎃 As you embark on your hauntingly delightful trick-or-treat adventure with MSWD water in hand, remember to stay as hydrated ...</p>	Event	1	0	19	19	1	5.26%	0	
October 30, 2023 8:35 AM PDT	 Image	 <p>New Hire Please help us welcome Arthur Cabrera, who is joining MSWD as a Business Analyst. Arthur will perform a diverse range of analytical and coordinative duties in developing technology solutions that w...</p>	New Hire / Jobs	5	0	35	33	5	15.15%	0	
October 26, 2023 4:32 PM PDT	 Image	 <p>New Hire Please help us welcome Andrea Varela, who is joining MSWD as an Associate Engineer. Andrea will perform various civil engineering work in the research, design, and construction of our water and sew...</p>	New Hire / Jobs	8	0	50	47	8	17.02%	0	

Date	Format	Post	Labels	Likes	Comments	Impressions	Reach	Engagements	Engagement Rate	Saves	Video Views
October 24, 2023 7:47 AM PDT	Video	 <p>Join us for Water 101  Let the water knowledge flow! Sign up now for Water 101. Our next session is Thursday, Oct 26, focusing on the MSWD wastewater system. Sessions are held in person between 6-7 p.m. at the Desert ...</p>	Event	7	0		40	7	17.5%	0	
October 21, 2023 1:24 PM PDT	Image	 <p>Desert Horticultural Day This Saturday – it's Coachella Valley Garden Day from 8am to 2pm at UCR Palm Desert. To find out more, visit :https://loom.ly/pUnL_Ag</p>	Event	6	0	53	45	6	13.33%	0	
October 19, 2023 1:15 PM PDT	Image	 <p>Day Without Water What if you had to go a day without water? For millions of Americans, lack of access to clean water is a harsh reality, not something to be imagined. On October 19th, let's get loud—online and in o...</p>	Event	6	0	27	23	6	26.09%	0	
October 18, 2023 4:47 PM PDT	Video	 <p>Regional Plat Update  Construction update! Work on the Nancy Wright Regional Water Reclamation Facility continues. Projects like this protect our groundwater and ensure we will have safe, high-quality drinking wate...</p>	Worker Wed	4	0		47	4	8.51%	0	

Date	Format	Post	Labels	Likes	Comments	Impressions	Reach	Engagements	Engagement Rate	Saves	Video Views
October 17, 2023 12:15 PM PDT	Image	 <p>Community Calendar 💙💧 People of all ages can work together to conserve water. Even children can help by turning off the faucet while brushing their teeth. Just ask Joziah D. from Julius Corsini Elementary School, who...</p>	Event	4	0	26	23	4	17.39%	0	
October 13, 2023 5:22 PM PDT	Image	 <p>Water Professionals Week 💧 As we near the end of Water Professionals Week, today we would like to honor Lisa Pelton, Customer Service Representative II. As a lifelong resident of Desert Hot Springs, Lisa Pelton has a spec...</p>	Event	8	0	45	35	8	22.86%	0	
October 12, 2023 2:47 PM PDT	Image	 <p>Water Professionals Week 💧 Celebrating Water Professionals Week, MSWD would like to highlight Jason Weekley, Lead Field Operations Technician. According to Jason, every day is an opportunity to learn something new. As par...</p>	Event	4	0	35	28	4	14.29%	0	

Date	Format	Post	Labels	Likes	Comments	Impressions	Reach	Engagements	Engagement Rate	Saves	Video Views
October 11, 2023 2:38 PM PDT	Image	 <p>Water Professionals Week Celebrating Water Professionals Week, MSWD is highlighting Accounting Technician Ana Murillo. To Ana, MSWD represents one important thing—community. Being the community's water and wastewater prov...</p>	Event	7	0	47	36	7	19.44%	0	
October 10, 2023 1:39 PM PDT	Image	 <p>Water Professionals Week As we move forward with Water Professionals Week, today we would like to highlight David Pena, Field Service Representative II. They say that everyone loves a good mystery, but a more accurate t...</p>	Event	7	0	52	41	7	17.07%	0	
October 09, 2023 4:12 PM PDT	Image	 <p>Water Professionals Week October 7-15 is Water Professionals Appreciation Week! Celebrated by water agencies throughout the state, the week brings public awareness to the important role of water industry professionals and...</p>	Event	8	0	65	49	8	16.33%	0	

Date	Format	Post	Labels	Likes	Comments	Impressions	Reach	Engagements	Engagement Rate	Saves	Video Views
October 04, 2023 4:53 PM PDT	Image	 <p>Worker Wed Replacing Valve 👷💧💙 Hats off to our field crews! The MSWD team works to keep our water and wastewater systems operating by maintaining pipes and quickly making repairs. Show here the team is working on a valve ...</p>	Worker Wed	10	0	55	40	11	27.5%	1	
October 02, 2023 2:59 PM PDT	Image	 <p>Breast Cancer Awareness Month 💖 MSWD is proud to stand alongside the global community in supporting Breast Cancer Awareness Month. Held in October each year, the month aims to promote screening and prevention of the disease, whi...</p>	Event	3	0	39	29	3	10.34%	0	
October 01, 2023 2:44 PM PDT	Video	 <p>Toilet Tank Repair Month 🚽💧 We highlight #NationalToiletTankRepairMonth as a reminder to check our toilets for leaks in need of repair. Fixing the flapper on your toilet is simple to do and will save water and money. Plus, ...</p>	Conservation/Reba...	4	0		76	4	5.26%	0	
Total				92	0	548	611	93		1	
Average				5.8	0.0	42.2	38.2	5.8	15.22%	0.1	

LinkedIn Account Overview (October 1 - 31, 2023)

Posts Published <h1 style="margin: 0;">10</h1> <p style="margin: 0;">+6 150.0%</p>	Likes <h1 style="margin: 0;">69</h1> <p style="margin: 0;">+46 200.0%</p>	Views <h1 style="margin: 0;">59</h1> <p style="margin: 0;">+38 181.0%</p>	Followers <h1 style="margin: 0;">260</h1> <p style="margin: 0;">+2 0.8%</p>
Comments <h1 style="margin: 0;">1</h1> <p style="margin: 0;">+1</p>	Impressions <h1 style="margin: 0;">1,601</h1> <p style="margin: 0;">+1,108 224.7%</p>	Clicks <h1 style="margin: 0;">37</h1> <p style="margin: 0;">+26 236.4%</p>	Engagement Rate <h1 style="margin: 0;">8.1%</h1> <p style="margin: 0;">0.0 -1.4%</p>

3 Most Engaging Posts	3 Most Shared Posts
<div style="display: flex; align-items: flex-start;"> <div style="flex-grow: 1;"> <p>New Hire</p> <p>Please help us welcome Andrea Varela, who is joining MSWD as an Associate Engineer. Andrea will perform various civil...</p> </div> <div style="text-align: right; font-weight: bold;">10.63%</div> </div>	<div style="display: flex; align-items: flex-start;"> <div style="flex-grow: 1;"> <p>Water Professionals Week</p> <p>🔹 October 7-15 is Water Professionals Appreciation Week! Celebrated by water agencies throughout the state, the week b...</p> </div> <div style="text-align: right; font-weight: bold;">2</div> </div>
<div style="display: flex; align-items: flex-start;"> <div style="flex-grow: 1;"> <p>New Hire</p> <p>Please help us welcome Arthur Cabrera, who is joining MSWD as a Business Analyst. Arthur will perform a diverse range...</p> </div> <div style="text-align: right; font-weight: bold;">10.2%</div> </div>	<div style="display: flex; align-items: flex-start;"> <div style="flex-grow: 1;"> <p>Water Professionals Week</p> <p>🔹 As we move forward with Water Professionals Week, today we would like to highlight David Pena, Field Service Represe...</p> </div> <div style="text-align: right; font-weight: bold;">0</div> </div>
<div style="display: flex; align-items: flex-start;"> <div style="flex-grow: 1;"> <p>Water Professionals Week</p> <p>🔹 As we near the end of Water Professionals Week, today we would like to honor Lisa Pelton, Customer Service Represent...</p> </div> <div style="text-align: right; font-weight: bold;">9.5%</div> </div>	<div style="display: flex; align-items: flex-start;"> <div style="flex-grow: 1;"> <p>Water Professionals Week</p> <p>🔹 Celebrating Water Professionals Week, MSWD would like to highlight Accounting Technician Ana Murillo. To Ana, MSWD...</p> </div> <div style="text-align: right; font-weight: bold;">0</div> </div>

3 Least Engaging Posts



Day Without Water

What if you had to go a day without water? For millions of Americans, lack of access to clean water is a harsh realit...

4.48%



Water Professionals Week

🔹 Celebrating Water Professionals Week, MSWD would like to highlight Jason Weekley, Lead Field Operations Technician. ...

4.84%



Community Calendar

💙💧 People of all ages can work together to conserve water. Even children can help by turning off the faucet while brus...

5.77%

3 Least Shared Posts



New Hire

Please help us welcome Arthur Cabrera, who is joining MSWD as a Business Analyst. Arthur will perform a diverse range...

0



New Hire

Please help us welcome Andrea Varela, who is joining MSWD as an Associate Engineer. Andrea will perform various civil...

0












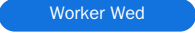








Day Without Water










What if you had to go a day without water? For millions of Americans, lack of access to clean water is a harsh realit...





0

LinkedIn Post Metrics (October 1 - 31, 2023)

Date	Format	Post	Labels	Shares	Clicks	Engagement Rate	Reactions	Impressions	Comments
<p>October 30, 2023 8:35 AM PDT</p>	<p> Image</p>	<p> New Hire Please help us welcome Arthur Cabrera, who is joining MSWD as a Business Analyst. Arthur will perform a diverse range of analytical and coordinative duties in developing technology solutions that w...</p>	<p>New Hire / Jobs</p>	<p>0</p>	<p>1</p>	<p>10.2%</p>	<p>4</p>	<p>49</p>	<p>0</p>
<p>October 26, 2023 4:32 PM PDT</p>	<p> Image</p>	<p> New Hire Please help us welcome Andrea Varela, who is joining MSWD as an Associate Engineer. Andrea will perform various civil engineering work in the research, design, and construction of our water and sew...</p>	<p>New Hire / Jobs</p>	<p>0</p>	<p>8</p>	<p>10.63%</p>	<p>9</p>	<p>160</p>	<p>0</p>
<p>October 19, 2023 1:15 PM PDT</p>	<p> Image</p>	<p> Day Without Water What if you had to go a day without water? For millions of Americans, lack of access to clean water is a harsh reality, not something to be imagined. On October 19th, let's get loud—online and in o...</p>	<p>Event</p>	<p>0</p>	<p>0</p>	<p>4.48%</p>	<p>3</p>	<p>67</p>	<p>0</p>

Date	Format	Post	Labels	Shares	Clicks	Engagement Rate	Reactions	Impressions	Comments
October 18, 2023 4:47 PM PDT	 Video	 <p>Regional Plat Update  Construction update! Work on the Nancy Wright Regional Water Reclamation Facility continues. Projects like this protect our groundwater and ensure we will have safe, high-quality drinking wate...</p>		0	3	7.32%	3	82	0
October 17, 2023 12:15 PM PDT	 Image	 <p>Community Calendar  People of all ages can work together to conserve water. Even children can help by turning off the faucet while brushing their teeth. Just ask Joziah D. from Julius Corsini Elementary School, who...</p>		0	0	5.77%	3	52	0
October 13, 2023 5:22 PM PDT	 Image	 <p>Water Professionals Week  As we near the end of Water Professionals Week, today we would like to honor Lisa Pelton, Customer Service Representative II. As a lifelong resident of Desert Hot Springs, Lisa Pelton has a spec...</p>		0	8	9.5%	9	179	0

Date	Format	Post	Labels	Shares	Clicks	Engagement Rate	Reactions	Impressions	Comments
October 12, 2023 2:47 PM PDT	 Image	 <p>Water Professionals Week Celebrating Water Professionals Week, MSWD would like to highlight Jason Weekley, Lead Field Operations Technician. According to Jason, every day is an opportunity to learn something new. As par...</p>		0	1	4.84%	2	62	0
October 11, 2023 2:38 PM PDT	 Image	 <p>Water Professionals Week Celebrating Water Professionals Week, MSWD would like to highlight Accounting Technician Ana Murillo. To Ana, MSWD represents one important thing—community. Being the community's water and waste...</p>		0	3	8.81%	11	159	0
October 10, 2023 1:38 PM PDT	 Image	 <p>Water Professionals Week As we move forward with Water Professionals Week, today we would like to highlight David Pena, Field Service Representative II. They say that everyone loves a good mystery, but a more accurate t...</p>		0	4	6.15%	15	309	0

Date	Format	Post	Labels	Shares	Clicks	Engagement Rate	Reactions	Impressions	Comments
October 09, 2023 4:12 PM PDT	 Image	 <p>Water Professionals Week  October 7-15 is Water Professionals Appreciation Week! Celebrated by water agencies throughout the state, the week brings public awareness to the important role of water industry professionals and...</p>		2	8	9.18%	17	305	1
Total				2	36		76	1,424	1
Average				0.2	3.6	7.69%	7.6	142.4	0.1

Protect Your Pipes During Family Gatherings

With the holidays fast approaching, many will be gathering and preparing meals for their families and friends. When you cook with fats, oils, and grease (FOG), your first instinct is to pour it down the drain or rinse your pan in the sink directly after cooking. Unfortunately, pouring these substances down the drain is one of the most common sources of plumbing issues both in homes and the wastewater system.

Substances such as butter, gravy, food scraps and salad dressings build up inside pipes, eventually leading to clogs

that can cause overflows into your home, expensive visits from the plumber and backups in the sewer system.

Liquids such as oil, turkey drippings or bacon grease should be poured into a can or old container, then placed in the garbage. Food waste, including cheeses and avocados, should also go in the trash. And don't forget to wipe greasy cooking pans out with a paper towel before washing.



Behind on your bills? Help is available!

MSWD believes supporting our neighbors builds a stronger, more connected community. Due to restrictions in California's Constitution, MSWD cannot offer discounted water rates or bill credits/forgiveness to customers. However, the District offers payment plans to help customers bring their accounts current.

MSWD has also partnered with multiple community agencies to help customers in need. The Low Income Household Water Assistance Program (LIHWAP) is an emergency assistance program to help low-income families with past due water/sewer bills. To qualify, you must be a Riverside County resident, have an unpaid water/sewer bill, and meet income guidelines.

MSWD has also partnered with United Way of the Desert to create Help2Others, a fund that provides bill assistance to low-income customers. MSWD employees and vendors contribute thousands of dollars each year to Help2Others and United Way of the Desert to meet this need.

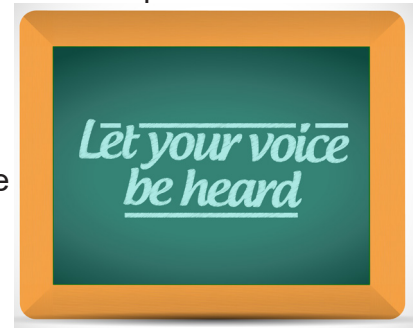
Eligible MSWD customers who participate in Help2Others can receive a \$100 credit on their water bill once in a 12-month period.

To learn more about LIHWAP, Help2Others and other assistance programs available to MSWD customers,

visit www.MSWD.org/billassistance or call 760.329.6448.

Your Voice Matters! Community Survey on its Way

MSWD wants to hear from our community to determine the most important priorities for the next five+ years. The District has partnered with Probolsky Research, an independent survey research firm, to conduct a statistically valid and representative community survey about the District's water and wastewater services.



Customers will receive an English/Spanish invitation asking them to participate and provide feedback.

Customers may receive a survey by:

- Phone call
- Email
- Text

On behalf of MSWD, we thank you for your participation in our survey. Your input will help us identify ways to serve you better now and in the future.

Proteja sus tuberías durante las reuniones familiares

Con las fiestas acercándose rápidamente, muchos se reunirán y prepararán comidas para sus familias y amigos. Cuando cocine con grasas, aceites y manteca (FOG, por sus siglas en inglés), su primer instinto es verterlos por el desagüe o enjuagar su sartén en el fregadero directamente después de cocinar. Desafortunadamente, verter estas sustancias por el desagüe es una de las fuentes más comunes de problemas de plomería tanto en los hogares como en el sistema de aguas residuales.

Sustancias como la mantequilla, la salsa, los restos de comida y los aderezos para ensaladas se acumulan dentro de las tuberías, lo que eventualmente provoca

obstrucciones que pueden causar desbordamientos en su hogar, visitas costosas del fontanero y respaldos en el sistema de alcantarillado.

Los líquidos como el aceite, los jugos de pavo o la grasa de tocino deben verterse en una lata o un recipiente viejo, y luego colocarse en la basura. Los desechos de comida, incluidos los quesos y los aguacates, también deben ir a la basura. Y no olvide limpiar las sartenes de cocina grasientas con una toalla de papel antes de lavarlas.



¿Atrasado en sus facturas? ¡Hay ayuda disponible!

MSWD cree que apoyar a nuestros vecinos construye una comunidad más fuerte y conectada. Debido a las restricciones en la Constitución de California, MSWD no puede ofrecer tarifas de agua con descuento ni créditos/perdón de facturas a los clientes. Sin embargo, el Distrito ofrece planes de pago para ayudar a los clientes a poner al día sus cuentas.

MSWD también se ha asociado con varias agencias comunitarias para ayudar a los clientes necesitados. El Programa de Asistencia de Agua para Hogares de Bajos Ingresos (LIHWAP, por sus siglas en inglés) es un programa de asistencia de emergencia para ayudar a las familias de bajos ingresos con facturas de agua/alcantarillado vencidas. Para calificar, debe ser residente del condado de Riverside, tener una factura de agua/alcantarillado sin pagar y cumplir con los requisitos de ingresos.

MSWD también se ha asociado con United Way of the Desert para crear Help2Others, un fondo que brinda asistencia de facturas a los clientes de bajos ingresos. Los empleados y proveedores de MSWD contribuyen miles de dólares cada año a Help2Others y United Way of the Desert para satisfacer esta necesidad.

Los clientes elegibles de MSWD que participen en Help2Others pueden recibir un crédito de \$100 en su factura de agua una vez en un período de 12 meses.

Para obtener más información sobre LIHWAP, Help2Others y otros programas de asistencia disponibles para los clientes de MSWD, **visite www.MSWD.org/billassistance** o llame al 760.329.6448.

¡Su voz importa! Encuesta comunitaria en camino

MSWD quiere escuchar a nuestra comunidad para determinar las prioridades más importantes para los próximos cinco años o más. El Distrito se ha asociado con Probolsky Research, una firma independiente de investigación de encuestas, para realizar una encuesta comunitaria estadísticamente válida y representativa sobre los servicios de agua y alcantarillado del Distrito.



Los clientes recibirán una invitación en inglés/español pidiéndoles que participen y den su opinión. Los clientes pueden recibir una encuesta por:

- Llamada telefónica
- Correo electrónico
- Mensaje de texto

En nombre de MSWD, le agradecemos su participación en nuestra encuesta. Su opinión nos ayudará a identificar formas de servirle mejor ahora y en el futuro.

APPENDIX D – Public Comment Letters – Proposed Making Conservation a
California Way of Life Regulation



October 16, 2023

Courtney Tyler, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000
commentletters@waterboards.ca.gov

Subject: Comment Letter—Proposed Making Conservation a California Way of Life Regulation

Dear Honorable State Water Resources Control Board,

Mission Springs Water District would like to express our appreciation for the opportunity to comment on the proposed Making Conservation a California Water of Life Regulations. We understand these regulations will expand storage, develop new water supplies, promote more efficient water use, and cultivate long-term practices that help communities adapt to California's ongoing water challenges.

MSWD serves approximately 36,000 residents in Desert Hot Springs, North Palm Springs, and the surrounding unincorporated areas. Under the State's proposed framework, MSWD is being asked to cut water use between 19 and 42 percent between 2025 and 2035. Our citizens already have some of the lowest per capita usage in the Coachella Valley, and since 2013, they have reduced their usage by almost 14 percent. We feel the State's proposed standards are neither reasonable nor feasible for our desert community.

Affordability

Our region is home to several disadvantaged communities (DACs) and fixed-income retirees. The median income for our service area is just above \$33,000, and more than a third of residents live at or below the poverty line. Strict water use standards will require the District to spend more to comply, negatively impacting water rates for customers already struggling to make ends meet. DAC homes tend to be older and less efficient indoors, and these customers cannot withstand the financial burden of installation costs associated with updating indoor plumbing fixtures or outdoor landscaping. We respectfully request that the State provide funding to support DACs through this transition.

Timing

We are concerned that the proposed timelines in the draft Regulation are not reasonable. We must make significant system changes and influence customer behaviors to successfully achieve the proposed regulation's goals. This will require significant resources. We concur with the comment by ACWA to modify the proposed timelines to provide an additional five or more years for all suppliers to achieve compliance.

10/17/2023

Courtney Tyler, Clerk to the Board, State Water Resources Control Board

Variance Reporting

While we are grateful for the opportunity to apply for variances, the process is labor-intensive and will require more time than is available before the standards go into effect. We request that you realign the submission process to ensure agencies have time to thoroughly analyze data and submit information to the State before compliance is required. Additionally, variance reporting is burdensome specifically because it is required annually. The circumstances that justify variances will not change significantly enough annually to merit this frequency in the calculation. We request that variance reporting be completed every five years instead of annually.

Outdoor Water Use Standard

Unlike our neighbors in the Coachella Valley, MSWD has very little irrigated turf. We would like to understand better the source of evapotranspiration for areas that do not have California Irrigation Management Information System (CIMIS) stations within their service areas. A significant range of evapotranspiration data within the current information seems inaccurate, especially for the western Coachella Valley. It appears to pull data from CIMIS stations west of the mountain ranges that bound the Coachella Valley. We request that the State allow substantial flexibility in providing local ET data. Further, we are very concerned that the landscape efficiency factor (LEF) values are too low to irrigate both new and existing landscapes efficiently.

Again, while we support the spirit of this rulemaking and the State's attempt to implement more water conservation measures state-wide, MSWD does not believe a 19-42% water use reduction is reasonable or feasible. We ask that the State Board provide an alternative compliance pathway, which includes technical assistance to address feasibility concerns so that we can develop a cost-effective, sustainable, long-term program that is reasonable and feasible in its practice.

Thank you again for providing us with an opportunity to comment. We look forward to continuing to work with you on this topic.

Sincerely,



Brian Macy
Interim General Manager
Mission Springs Water District



October 17, 2023

Courtney Tyler, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000
commentletters@waterboards.ca.gov

Subject: Comment Letter—Proposed Making Conservation a California Way of Life Regulation

Dear Honorable State Water Resources Control Board,

The Coachella Valley Regional Water Management Group (CVRWMG) is comprised of the Coachella Water Authority (CWA), Coachella Valley Water District (CVWD), Desert Water Agency (DWA), Indio Water Authority (IWA), Mission Springs Water District (MSWD), and Valley Sanitary District (VSD). The group represents a collaborative effort to implement the Coachella Valley Integrated Regional Water Management (CVIRWM) Plan to address the water resources planning needs of the Coachella Valley. The CVRWMG's Region is located in central Riverside County, within the Colorado River Funding Area.

The CVRWMG would like to express our appreciation for the opportunity to comment on Proposed Making Conservation a California Way of Life Regulation (Regulation). We would also like to express our appreciation for the scaled-back reporting requirements for 2024 as we continue to collaborate on the best ways to implement these new regulations.

Please note that our agencies have also signed the letter from the Association of California Water Agencies (ACWA).

Our fundamental comment is that implementation of these regulations will be a significant burden on agencies, and we are seeking additional time and resources to implement the requirements. Specific recommendations below.

Timing

We are concerned that the proposed timelines in the draft Regulation are not reasonable. To be successful in achieving the goals of this regulation, we must make significant changes to physical spaces, agency systems, and customer behavior. All will require significant resources. We concur with the comment by ACWA to modify the proposed timelines for the outdoor standards to provide an additional five years for all suppliers to achieve compliance.

Data Error Adjustment

Implementing a regulation of this magnitude requires a significant amount of data, much of which is being used in this manner for the first time. We recognize that there is a lot of work to be done statewide in this regard and we are all committed to providing the most accurate data possible in all State reporting. However, there are bound to be errors in the data being used to calculate these regulations. Therefore, we concur with the comment by ACWA to allow for a Data Error Adjustment.

Variance Reporting

While we are grateful for the opportunity to apply for variances, the process is labor intensive and will require more time than is available before the standards go into effect. We request that you realign the submission process to ensure agencies have time to thoroughly analyze data and submit information to the State before compliance is required. To do so, we reiterate our request to allow an additional five years to achieve compliance.

Additionally, variance reporting is burdensome specifically because it is required annually. The circumstances that justify variances will not change significantly enough on an annual basis to merit this frequency in calculation. We request that variance reporting be completed every five years instead of annually.

Outdoor Water Use Standard

As an arid region, we have particular interest in the outdoor water use standards. We would like to better understand the source of evapotranspiration for areas that do not have California Irrigation Management Information System (CIMIS) stations within their services areas. Within the current information, there is a significant range of evapotranspiration data that seems inaccurate, especially for the western Coachella Valley. It appears to be pulling data from CIMIS stations west of the mountain ranges that bound the Coachella Valley. We are requesting that the State allow for substantial flexibility in providing local ET data.

Further, we are very concerned that the landscape efficiency factor (LEF) values are too low to efficiently irrigate both new and existing landscapes. The draft Regulation sets LEF for residential use at 0.55 and for non-residential use at 0.45. These factors are design standards included in the Model Water Use Landscape Ordinance, but are not reflective of real-world landscape efficiency.

Irrigable Not Irrigated (INI) Lands

The inclusion of INI areas in the outdoor water use calculation is important and we can see no reason why the areas inclusion should expire in 2027. INI lands are an important factor in reaching our outdoor targets since they could reflect areas that may not have been irrigated at the time LAM data was captured. Given that LAM data will not be real-time, a deadline for INI inclusion is inappropriate. Further, AB1668 provides that the standards shall apply to irrigable lands and this proposed regulation is inconsistent with the statute.

Required Best Management Practices

As included in the ACWA letter, the draft Regulation requires suppliers to "employ" actions and technologies for large landscapes. This is problematic in that the use of programs, projects, and technologies falls to the customer, not the agencies. Agencies may or may not be able to get participation from customers for any number of best management practices. Therefore, we support the change from "employ" to "offer" in the regulations to align with agencies' authority.

Pools and Spas

The residential factor for all swimming pools should be 1.0 because water evaporates at about 1.0. Therefore, this is the appropriate factor to be used in calculations for all pools. Our region experiences exceptionally high temperatures and pools are extremely prevalent and often considered a quality-of-life component. Data from existing pool cover incentive programs shows that the programs are ineffective in reducing water use. Additionally, pools must be drained and refilled every few years to maintain healthy chemical balance. Residential pools should not be a temporary provision and should have a 1.0 factor.

Affordability

The Coachella Valley is home to a number of disadvantaged communities (DACs) populations as well as retirees on fixed incomes. Strict standards will result in agencies spending more to comply and will impact water rates. DAC homes tend to be older and less efficient indoors. Further, DACs cannot withstand the financial burden of updating landscaping. Communities like the Coachella Valley with significant DAC populations may struggle to get the community investment necessary to comply. We request that the State provide funding to support DACs through this transition.

Alternative Compliance

We appreciate that the draft Regulation includes an alternative compliance pathway. Many agencies are facing unreasonable or unattainable objectives that will be extremely resource intensive so this pathway will be essential. However, we are extremely concerned that it is not available until 2035 and that it is too burdensome. The alternative compliance option should be streamlined and made available as soon as the regulations go into effect.

Thank you again for providing an opportunity to comment. We look forward to continuing to work with you on this topic.

Sincerely,



Zoe Rodriguez del Rey
On behalf of the Coachella Valley Regional Water Management Group
Water Resources Manager
Coachella Valley Water District

CVRWMG agency representatives:

Steve Johnson, Desert Water Agency
Ron Buchwald, Valley Sanitary District
Castulo Estrada, Coachella Water Authority
Reymundo Trejo, Indio Water Authority
Marion Champion, Mission Springs Water District

October 16, 2023

Courtney Tyler, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000
commentletters@waterboards.ca.gov

Subject: Comment Letter—Proposed Making Conservation a California Way of Life Regulation

Dear Honorable State Water Resources Control Board,

The City of Desert Hot Springs would like to express our appreciation for the opportunity to comment on the proposed Making Conservation a California Water of Life Regulations. We understand that these regulations will expand storage, develop new water supplies, promote more efficient water use, and, most of all, cultivate long-term practices that help communities adapt to California's ongoing water challenges.

The City of Desert Hot Springs is located within the Mission Springs Water District service area in the Coachella Valley. MSWD is being asked to cut water use between 19 and 42 percent between 2025 and 2035. Our citizens already have some of the lowest per capita usage in the Coachella Valley, and since 2013, they have reduced their usage by almost 14 percent.

As an arid region, we are concerned with the outdoor water use standards, particularly the source of evapotranspiration data for areas that do not have California Irrigation Management Information System (CIMIS) stations within their areas. We ask the State to provide more information on the assumptions used to extrapolate the State.

The City of Desert Hot Springs and the Coachella Valley are home to many disadvantaged communities (DACs) as well as retirees who live on fixed incomes. The impact of these standards on these communities is unclear. DAC homes tend to be older and less efficient, and the need to comply with indoor standards could adversely impact these residents. Further, these communities cannot afford to update landscaping to comply with outdoor standards. We request that the State provide funding to support DACs through this transition.

While the City of Desert Hot Springs supports the spirit of this rulemaking, we do not believe it is reasonable or feasible for our residents. We ask that the State provide districts like

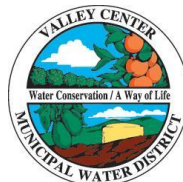
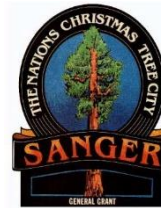
MSWD with an alternative compliance pathway, which includes technical assistance to address feasibility concerns and an adjustment to the compliance period so that MSWD has the time and resources needed to implement a program that meets the State's conservation goals while upholding the quality of life our residents deserve.

If you have any questions, please do not hesitate to contact me directly at smatas@cityofdhs.org or at (760) 329-6411.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Matas", written over a horizontal line.

Scott Matas, Mayor
City of Desert Hot Springs



October 17, 2023

Submitted via: commentletters@waterboards.ca.gov

Mr. E. Joaquin Esquivel, Chair
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Re: Comment Letter – Proposed Regulations on Making Water Conservation a California Way of Life

Dear Chairman Esquivel,

The undersigned organizations appreciate the opportunity to provide comments to the State Water Resources Control Board (State Water Board or Board) on the Proposed Regulations for Making

Conservation a California Way of Life (Regulations). We are a group of water suppliers who are subject to, and who have been actively involved in the development of, the Regulations that the State Water Board is charged with adopting pursuant to SB 606 and AB 1668 (together, the 2018 conservation legislation). All of us have a long-standing commitment to water use efficiency, as demonstrated by the substantial decreases in total and per capita water use that our customers have achieved, most at levels well beyond 20 x 2020 targets. We support the intent of the legislation to make conservation a way of life with cost effective water conservation programs that would achieve even greater efficiencies that we have already achieved.

Thank you also for the opportunity to provide comments at the Board workshop on October 4. It was a marathon session, and we appreciate the willingness of the Board to allow speakers from around the state to present information about the ways the Regulations would affect their operations, and the Board members staying to listen throughout. We also particularly appreciate the comments that various Board members made about the cost, feasibility, and timing of actions that water agencies will be required to take to meet the proposed Regulations, and more importantly whether or not our customers would be able to cost-effectively implement the measures that the Regulations would require. After all, it is the actions of our customers that will ultimately determine our ability to comply with the Regulations.

The Association of California Water Agencies (ACWA) has prepared and submitted a more comprehensive and detailed set of comments on the Regulations. We support most of the recommendations made in that letter, and some of the signatories to this letter are also signatories to the ACWA letter. This letter includes the few elements of the Regulations that are in addition to, or differ from, ACWA's comments. We are also providing in the attachment our recommended edits to the proposed Regulations. Before describing those elements and edits, we would like to draw the Board's attention to a recent report prepared for Mesa Water District by M.Cubed, which reviews the information provided in the Standardized Regulatory Impact Analysis (SRIA). That report is available at this link: [Mesa Water SRIA Review Tech Memo Final Sept 28.2023.pdf](#)

The SRIA estimates that the Regulations will impose at least \$13 billion in costs on California residents and businesses to meet these standards. However, according to M.Cubed's analysis, these costs are significantly underestimated. More significantly, the SRIA's projected benefits of \$15 billion not only double-counted \$4.5 billion in cost shifts, but the remaining \$10.5 billion in benefits is estimated from an erroneous projected reduction in water purchase costs. Using a sales-weighted adjustment to average costs to compute a more accurate statewide picture of potential savings, M.Cubed's calculations resulted in a 50% reduction in the SRIA's asserted benefits. San Juan Water District reviewed in more detail the cost data provided by its retail water agency customers, and their reduced wholesale water purchase costs would only be approximately 25% of the figure used by the SRIA. Many water agencies continue to adjust their fixed and variable rates to ensure that fixed costs remain funded. However, the actual reduction in water purchase costs underlying the SRIA's estimate of benefits may well more closely reflect the figures in San Juan's customer group, due to the fact that San Juan's current wholesale rates include fixed costs that comprise approximately 75% of the total price of their wholesale water supplies.

COMMENTS ON SPECIFIC ELEMENTS OF THE REGULATIONS

Outdoor standards apply to “irrigable” lands

The proposed Regulations limit the applicability of the outdoor standard to irrigated acreage, unless Board staff approve an additional 20% maximum of non-irrigated area that has become irrigated. This approach is not authorized by and is inconsistent with the statute, which states:

“The department, in coordination with the board, shall conduct necessary studies and investigations and recommend, no later than October 1, 2021, standards for outdoor residential use for adoption by the board in accordance with this chapter...

The standards shall apply to irrigable lands.” (Water Code §10609.6(a)(2)(B)) (emphasis added)

Notably, too, the primer prepared in 2018 by the Department of Water Resources (DWR) and Board staff also clearly note this statutory construct. On page eight of the primer, the following description is provided:

“Standards for outdoor residential water use that apply to residential irrigable lands, including provisions for swimming pools, spas, and ornamental water features that are artificially supplied with water, and incorporating principles of the Model Water Efficient Landscape Ordinance (MWELO) (CWC §10609.6)”. (emphasis added)

Recommendation 1 – revise the references in the outdoor standard (including in the definition of residential landscape area) to “irrigable lands” and adjust the acreages used for determining outdoor usage budgets for all agencies accordingly.

The Board can only adopt one regulatory standard

The framework proposes to establish a series of outdoor landscape standards, starting with a landscape efficiency factor of 80% through June 30, 2030, then changing to 63% from that point in time through June 30, 2035, and then changing again thereafter to 55% for residential landscapes and 45% for CII landscapes. The 2018 legislation clearly states the Legislature’s intent to limit the Board’s authority to adopting a “one-time” standard, with promulgation of any future standards requiring specific additional authority to be provided to the Board by the Legislature. This limitation is described in Water Code §10609(b)(4):

“This chapter preserves the Legislature’s authority over long-term water use efficiency target setting and ensures appropriate legislative oversight of the implementation of this chapter by doing all of the following... Providing one-time-only authority to the department and board to adopt water use efficiency standards, except as explicitly provided in this chapter. Authorization to update the standards shall require separate legislation.” (Emphasis added.)

Furthermore, the Legislature states that the landscape efficiency factor values should reflect a factor that allows for “the amount of water necessary to efficiently irrigate both new and existing landscapes.” (Water Code Section 10609.9 – emphasis added). As described by numerous speakers at the October 4

workshop, and in multiple written comments regarding both the proposed framework for these Regulations released by Board staff in March 2023 and the recommendations submitted to the Board by the Department of Water Resources, the proposed 2035 standard would not provide adequate water supplies to existing landscapes.

Recommendation 2 – revise the outdoor standards to specify that there will be one standard that uses an evapotranspiration adjustment factor of 0.63, to be applied to irrigable lands, starting in 2035.

CII Program Reporting Must be Feasible

ACWA is providing important comments and suggested edits on the requirements in the Regulations related to the appropriate scope of activities and responsibilities of water suppliers for commercial, industrial and institutional (CII) performance measures. As noted in Water Code Section 10608.12(n), performance measures include educational and outreach activities, audits, plans, and similar actions that can be conducted by water suppliers. Section 975(d)(3) of the Regulations contains citations to sections of the Regulations that don't exist, but it appears that the intent of that section is to seek information about the activities that water suppliers conduct to educate and interact with the CII account holders that are in the top 20% of water use category and the top 2.5% of water use category defined in Sections 974(c) and (d), respectively.

Water suppliers can provide information to CII customers about best management practices, but only the CII customers can actually implement them. Consequently, the reporting requirements in Section 975(d)(3) should be limited to the information that water suppliers can provide about their activities. Collecting information about activities conducted by CII customers, such as their implementation of best management practices, would be contingent upon the cooperation of CII customers, and may well not even be possible. Similarly, estimates about the amount of water saved would be speculative, at best, while increased agency costs would be certain.

Recommendation 3 – delete Sections 975(d)(3)(C) and (D).

CLOSING REMARKS

Thank you again for the opportunity to provide comments to the State Water Board as it begins its formal rulemaking. We also very much appreciate the State Water Board staff's engagement with the water community. We look forward to collaborating further with the Board and staff to develop a regulatory framework that will reasonably, cost-effectively, and feasibly advance our shared goal of Making Water Conservation a California Way of Life in a manner that recognizes and accounts for every agency's unique circumstances, as well as the related costs and benefits of seeking each additional increment of water use efficiency.

Sincerely,

Larry B. McKenney, General Manager
Amador Water Agency

Joe Duran, General Manager
Orange Vale Water Company

Kristina Budak, P.E., Water Resources Director
City of Bakersfield

David Coxey, General Manager
Bella Vista Water District

Tony Goff, General Manager
Calleguas Municipal Water District

J. M. Barrett, General Manager
Coachella Valley Water District

Tom Moody, Director of Utilities
City of Corona

Michael Moore, General Manager / CEO
East Valley Water District

Greg Thomas, General Manager
Elsinore Valley Municipal Water District

Jack Bebee, General Manager
Fallbrook Public Utility District

Chris Berch, General Manager
Jurupa Community Services District

Dave Pedersen, General Manager
Las Virgenes Municipal Water District

Paul E. Shoenberger, P.E., General Manager
Mesa Water District

Brian Macy, Interim General Manager
Mission Springs Water District

Michele Donzé, General Manager
Myoma Dunes Water Company

Kimberly A. Thorner, General Manager
Olivenhain Municipal Water District

Dennis D. LaMoreaux, General Manager
Palmdale Water District

Brent Byrne, General Manager
Quartz Hill Water District

Kim Domingo, PE, General Manager
Rosamond Community Services District

Tom Coleman, General Manager
Rowland Water District

Miguel J. Guerrero, P.E., General Manager
San Bernardino Municipal Water Department

John Mulligan, Public Works Director
City of Sanger

Paul Helliker, General Manager
San Juan Water District

Matthew Litchfield, P.E., General Manager
Three Valleys Municipal Water District

Gary Arant, General Manager
Valley Center Municipal Water District

Van Grayer, General Manager
Vaughn Water Company

Greg A. Hammett, General Manager
West Kern Water District

ATTACHMENT

Requested edits to proposed regulations

§ 965. Definitions

...

(xx) “Residential landscape area” (RLA) means residential Irrigable ~~Irrigated~~ area ~~plus approved Irrigable Not Irrigated~~ area, in square feet.

§ 968. Outdoor Residential Water Use Standard

(a) (1) Through June 30, 2030~~05~~, the standard for efficient residential outdoor use (Soutdoor) shall be a landscape efficiency factor of 0.80.

~~(2) Beginning July 1, 2030, and through June 30, 2035, the standard for efficient residential outdoor use shall be a landscape efficiency factor of 0.63.~~

~~(3) Beginning July 1, 2035, the standard for efficient residential outdoor use shall be a landscape efficiency factor of 0.5563.~~

...

(b) (2) Residential landscape area includes, for each supplier:

~~(A) The supplier’s unique square footage of Irrigable ~~Irrigated~~ area provided by the Department to the Board on October 3, 2022, or any updates thereafter, minus any landscape area that the Department categorizes as residential but that the supplier categorizes as CII.~~

~~(B) Through June 30, 2027, a supplier may include in its residential landscape area up to twenty percent of the supplier’s unique square footage of Irrigable Not Irrigated area provided by the Department to the Board on October 3, 2022, if the supplier’s actual urban water use for the reporting year, calculated in accordance with section 10609.22, is greater than the urban water use objective calculated pursuant to section 966 without inclusion of Irrigable Not Irrigated area.~~

§ 975. Reporting

...

(d) No later than January 1, 2024, and by January 1 every year thereafter, each urban retail water supplier shall submit to the Department and the Board, for the previous state fiscal year, on a form provided by the Board, the following:

...

(3) Relevant and supporting data pursuant to section 974, including:

(A) The number of customers that exceed the threshold defined in section 974(a)(2).

(B) The number of customers for which the supplier has provided the information required pursuant to section 974(a)(2).

~~(C) For each of the classification categories specified in section 972 (a) and (b), the number of customers exceeding the threshold defined in section 974 (b), as well as the following:~~

~~(i) The practices implemented pursuant to section 974(b)~~

~~(ii) The implementation status of those practices~~

~~(iii) The estimated water saved as a result of those practices~~

~~(D) The number of customers that exceed the threshold defined in sections 974 (c) as well as the following:~~

~~(i) The practices implemented pursuant to section 974(b)~~

- ~~(ii) The implementation status of those practices~~
- ~~(iii) The estimated water saved as a result of those practices.~~



ACWA

ROA



CALIFORNIA AMERICAN WATER WE KEEP LIFE FLOWING®



PUBLIC WORKS

CAMROSA WATER DISTRICT



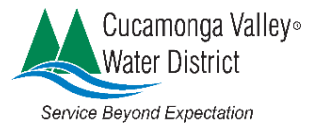
CITRUS HEIGHTS WATER DISTRICT



CITY OF REDDING CALIFORNIA

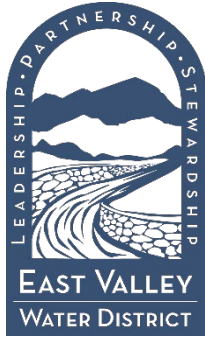


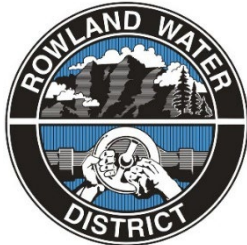
City of SACRAMENTO



DESERT WATER







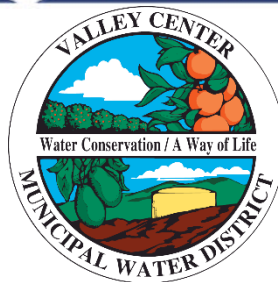
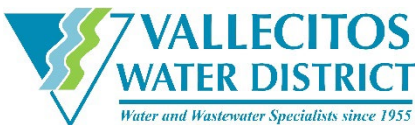
San Diego County Water Authority
And Its 24 Member Agencies



SOUTH COAST WATER DISTRICT
Partnering With The Community



Tahoe City Public Utility District



October 17, 2023

Submitted via: commentletters@waterboards.ca.gov

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

Re: Comment Letter — Proposed Making Conservation a California Way of Life Regulation

Dear Ms. Tyler,

The Association of California Water Agencies and the undersigned organizations appreciate the opportunity to provide comments to the State Water Resources Control Board (State Water Board) on the Draft Making Conservation a California Way of Life Regulation (Regulation). This comment letter (Comment Letter) is intended to provide constructive and comprehensive recommendations to the State Water Board to meaningfully advance water use efficiency, address urban retail water suppliers' constraints and concerns, and build on local and regional successes. We respectfully request the State Water Board's thoughtful consideration of our comments and recommendations, as supported by agency specific oral and written comments. We ask for the opportunity to work collaboratively with the State Water Board over the duration of the rulemaking to revise the draft Regulation to incorporate input from interested parties to support successful local and regional implementation.

This comment letter includes an Appendix with detailed suggested redline changes to the draft Regulation. We recognize the suggested redlines are one of many ways in which the draft Regulation could be modified to address suppliers' concerns. ACWA and the undersigned parties are committed to working with the State Water Board on revisions that support both the State's goals and water suppliers' successful implementation of a final Regulation. This Comment Letter is organized as outlined below:

SECTION 1. STATE & LOCAL PARTNERSHIP

SECTION 2. OVERARCHING POLICY CONCERNS & RECOMMENDATIONS

- I. Set Reasonable Timelines
- II. Recognize Data Errors & Limitations
- III. Provide Alternative Compliance
- IV. Align CII Performance Measures with Local Success
- V. Adhere to Legislative Requirements

SECTION 3. TECHNICAL CONCERNS & RECOMMENDATIONS

- I. Outdoor Standards
- II. CII Performance Measures
- III. Methodologies & Variances
- IV. Reporting

SECTION 4. APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS

SECTION 5. CLOSING REMARKS

SECTION 1: STATE & LOCAL PARTERSHIP

Water suppliers are on the front lines of managing the impacts of climate change to ensure a reliable water supply for California's diverse beneficial uses. The actions that suppliers take will vary across California depending on local and regional supplies and conditions. As water suppliers implement diverse projects to advance existing and new supplies, they have also long recognized water use efficiency as an important tool for climate resilience.

Over the past several decades, water suppliers have been pioneering local and regional programs to advance efficiency and improve drought planning and response. These programs have been complemented by statewide efforts to standardize drought planning and response and set statewide water conservation targets. The Water Conservation Act of 2009 directed the State to achieve a 20% reduction in per capita water use by 2020. The Department of Water Resources (DWR) Report to the Legislature on the Status of the 2020 Urban Water Management Plans (UWMPs) found that "California surpassed the 20% reduction and reduced per capita urban water use by 32%. Of the 386 Urban Retail Water Suppliers that submitted retail UWMPs, 374 of these (97%) achieved their targeted 2020 water use reduction."¹ While significant achievements have been made to use water wisely, the water community recognizes a continued effort toward greater efficiency is needed to prepare for more frequent and prolonged droughts and a hotter and drier climate.

As the State finalizes this new regulatory program to advance long-term water use efficiency, we ask that it recognizes water suppliers as a key partner to the State's success. Compliance with the regulation will fall solely on water suppliers and their ratepayers. The ability of water suppliers to implement the Regulation successfully and cost-effectively will determine California's success in advancing long-term water use efficiency. **We ask that the State Water Board work with ACWA and the water supplier community to address the policy and technical concerns outlined in this Comment Letter.**

Additionally, we ask for the State's leadership to secure resources to support cost-effective compliance with a final Regulation. Given the timelines of the CII Performance Measures (PMs) and broader water use objectives, we encourage the State to provide technical resources, data, and funding as soon as possible. We believe that increasing flexibility and reducing reporting burdens in the draft Regulation can help reduce costs. However, the State should allocate dedicated resources to support water suppliers and Californians' compliance. Additionally, the State should recognize and promote regional and statewide partnerships as a mechanism for suppliers to comply with the Regulation, particularly regarding the CII PMs. This will help leverage suppliers' limited resources and advance local capacity.

SECTION 2: OVERARCHING POLICY CONCERNS & RECOMMENDATIONS

I. SET REASONABLE TIMELINES

We have significant concerns that the timelines proposed in the draft Regulation are not reasonable, do not support cost-effective compliance, and would not achieve the multi-benefits desired. The timelines proposed for both the outdoor water use standards and the CII PMs are problematic. In order to successfully implement programs that require long-term customer behavior change and significant

¹ [Status of 2020 Urban Water Management Plans \(ca.gov\)](#). A Report to the Legislature pursuant to Section 10644 of the California Water Code. January 2023.

investments, water suppliers require adequate time to: analyze existing water use efficiency programs; plan for cost-effective compliance with the standards, objectives and performance measures; budget for and staff programs; partner with customers and build partnerships, including targeted programs for disadvantaged communities (DACs); and allow for technology advancements. Furthermore, we are concerned that these timelines could have unintended consequences, such as impacts to urban tree health and disproportionate impacts to DACs and water affordability.

We anticipate the State Water Board will consider adoption of the draft Regulation August 2024 and the final Regulation would go into effect October 2024.² Starting 2025, within three months of the Regulation’s expected effective date, 42% of suppliers would need to achieve a water reduction. By 2030, 74% of suppliers would need to achieve reductions (with a third by greater than 20%); and by 2035, 82% of suppliers would need to achieve reductions (with over 40% of suppliers by greater than 20%).³ Suppliers’ water use objectives, and the associated required reductions, could change if suppliers obtain variances. However, we are concerned the timeline also unreasonably limits suppliers’ ability to collect and submit the required data to obtain the variances.

Table 1: Urban Retail Water Suppliers by Percent Reduction

Reductions needed to meet proposed objective	2025	2030	2035
	% of urban retail water suppliers		
No Reduction	58%	26%	18%
Less Than 5% Reduction	10%	9%	9%
5-10% Reduction	9%	10%	11%
10-20% Reduction	13%	23%	21%
20-30% Reduction	7%	16%	20%
Greater Than 30% Reduction	3%	16%	21%

Additionally, all suppliers would be required to begin compliance with comprehensive CII PMs beginning January 1, 2025: suppliers would be required to identify all disclosable buildings by January 1, 2025 and notify building owners; ban the irrigation of non-functional turf on all CII Landscapes by July 1, 2025; classify all CII customers (20% by 2026); identify CII large landscapes with mixed-use meters (MUMs) and either install dedicated irrigation meters or employ in-lieu water technologies (20% by 2026); and design and implement best management practices (BMPs) by January 1, 2025 (20% of the top 20% of CII classification by 2026)(see Table 1). The currently proposed completion of all CII PMs within a five-year period, beginning 2025, would require significant resources and create implementation challenges. For example, it is unclear how suppliers would accurately implement BMPs for the top 20% of each classification while classifying CII customers. The compressed timeline is unnecessary and further increases costs to suppliers.

² Enacted legislation directed the State Water Board to adopt the Regulation by June 30, 2022. We recognize that there are factors beyond the State Water Board’s control as to the current status of the draft Regulation. However, currently proposed compliance timelines do not reflect the delayed status of the Regulation.

³ Provisional Data State Water Resources Control Board. (Version 2.0, 2023-09-13). We note that this table does not include the CIIDIM Outdoor Standard, variances, or data errors so the % reduction by % supplier could change.

Table 2: Proposed Regulation’s Compliance Schedule

	2024	'25	'26	'27	'28	'29	'30	'31	'32	'33	'34	'35
Reg Effective	Fall											
Indoor Standard.		47					42					
Res. Outdoor Standard		0.8					0.63					0.55
CIIDIM Outdoor Standard					0.8		0.63					0.45
Water Loss												
Variances												
Non-Functional Turf		July										
Disclosable Buildings			20%		60%		100%					
CII Classification (22 proposed)			20%		60%		100%					
CII BMPs			20%		60%		100%					
CII MUMs: In-Lieu or DIM			20%		60%		100%					
Reporting	Jan. 1											

We understand that the enacting legislation does not allow the State Water Board to issue a civil liability penalty until 2027. Additionally, we appreciate that the State Water Board has a positive track record of utilizing its enforcement discretion. However, we believe the intent of the State Water Board should be compliance, not enforcement discretion. Significant consideration of reasonable timelines is necessary.

RECOMMENDATION # 1. Modify the proposed timelines for the outdoor standards to provide an additional 5 years for all suppliers to achieve compliance.⁴

RECOMMENDATION # 2. Provide 10 years for suppliers to complete all CII PMs, with CII Classification completed between 2025 – 2030, and CII Mixed-Use Meter and CII BMP completed 2030 – 2035. Unstacking the CII BMPs from the CII Classification will allow suppliers to spread limited resources over a 10-year period, while still meeting the goals of the Regulation.

II. RECOGNIZE DATA ERRORS & LIMITATIONS

We appreciate that the intent of this Regulation is to shift away from a one-size fits all approach to one that incorporates local characteristics. A challenge with the approach is that the accuracy of the statewide efficiency standards and water suppliers’ water use objectives requires more, verified data, including both statewide and local data. Inaccurate data can create water use efficiency objectives that do not provide the local flexibility the enacting legislation intended. Currently, observed data gaps and inaccuracies include landscape area measurements (LAM) and population, and the application of Model Water Efficient Landscape Ordinance (MWELO) principles, including effective precipitation and irrigation efficiency.

The draft Regulation’s methodology should recognize that there are and will continue to be inherent data quality limitations and variability that impact suppliers’ compliance with their water objectives. The

⁴ The State Water Board has the authority to make this change as the only statewide water use efficiency standard with a legislatively mandated timeline for implementation are the residential indoor water use standards, as required in SB 1157 (Freidman, 2022).

State Water Board has accounted for data quality and variability issues in other regulations, such as the Water Loss Regulation, which provided that “a supplier shall maintain, for each compliance assessment, real loss that is no greater than 5 gallons per connection per day above the supplier’s real water loss standard.”⁵

As discussed further in Section 3.I. of this Comment Letter, we continue to have concerns with the three methodologies DWR utilized and data DWR excluded to develop its recommendation of the residential outdoor standards. We also recommend that the State evaluate if the observed inequities among inland and coastal communities’ water use objectives are attributable to DWR’s methodologies for developing the outdoor standards, such as the trimmed data and application of MWEL0, compounded with local data limitations.

RECOMMENDATION # 3. Include a “Data Error Adjustment” (DEA) in the formula for calculating suppliers’ water use objectives. The DEA would be a percentage, either five or ten percent as determined below, added to a supplier’s budget for efficient indoor residential water use, efficient outdoor residential water use and efficient water use on a CII landscape with a dedicated irrigation meter (DIM) or equivalent technology, as follows:

$$WUO = (R_{\text{indoor}} + R_{\text{outdoor}} + CII_{\text{DIM}}) \text{DEA} + L + V + Pr + BPR$$

The DEA would recognize suppliers’ historic progress and achieved savings (SB X7-7 based) and acknowledge that data used to develop and evaluate standards has intrinsic errors. The magnitude of the DEA would reduce over time as suppliers achieve progress towards their water use objective. We are proposing a five percent DEA for suppliers achieving less than 20 percent reduction from SB X7-7, and a 10 percent DEA for suppliers achieving a reduction of 20 percent or greater from SB X7-7.

Additionally, we note concern that a supplier may not comply with its water use objective because it is unable to obtain the information required for variances due to resource or other limitations. The draft Regulation identifies the calculations and data requirements to submit to the State Water Board to seek a variance. Collecting this data, however, could require significant resources for suppliers. Prior to taking any enforcement action, the State should offer technical assistance to a supplier, which should include through regional and/ or statewide partners, to determine if the unique water uses in the supplier’s service area, for which variances are available, would bring the supplier into compliance. We again reiterate that the goal of this Regulation should be successful compliance, rather than enforcement actions or enforcement discretion.

RECOMMENDATIONS # 4. Clarify that if a supplier does not meet its water use objective because it is unable to obtain the information required for the variances, prior to the issuance of any enforcement action, technical assistance must be offered to the supplier.

III. PROVIDE ALTERNATIVE COMPLIANCE

Our understanding is that State Water Board staff included section 966(i) to serve as an alternative compliance pathway in response to concerns water suppliers continue to raise regarding unreasonable

⁵ [Water Loss Control Regulations](#). Adopted Oct. 14, 2022.

or unattainable water use objectives. We appreciate the intent of this provision and believe that an alternative compliance pathway will be essential for some suppliers. Meaningful advancement of water use efficiency is an important goal of the State’s Water Supply Strategy and the draft Regulation. However, some suppliers are confronting significantly larger water reduction requirements. Many of these suppliers are in the central valley and inland communities and may also serve disadvantaged communities or low-income households. Additionally, many of these communities have demonstrated a commitment to advancing water use efficiency, as mentioned in Section 1 of this Comment Letter, including achieving their targeted 2020 water use reduction.

In addition to the five-year extension that we recommend be provided to all suppliers to comply with the requirements of the draft Regulation, we recommend an alternative compliance pathway be provided to suppliers that would incur unreasonable cost and affordability impacts to meet their proposed water use objective. As currently proposed, the alternative compliance pathway is problematic for the following reasons:

- It does not address 2025 and 2030 compliance for suppliers. As shown in Table 1 of this Comment Letter, some suppliers will have significant reductions in 2025 and 2030. The current proposal does not resolve compliance concerns for these suppliers.
- The provision of five additional years does not resolve compliance concerns for some suppliers with an unreasonable or unattainable objective.
- The eligibility requirements for the currently proposed alternative compliance pathway would impose a significant cost burden on suppliers for actions that may not help achieve compliance. For example, the SITES rating system costs \$9,600 per site to implement.
- Special districts, which include a significant number of urban retail water suppliers, would be ineligible for the alternative compliance pathway because they do not qualify for the Standards for Tree City USA Recognition. 90% of ACWA’s 470 members are special districts.
- The requirement for suppliers to dedicate 40% of funding to DACs conflicts with Proposition 218, which would cause feasibility issues for water suppliers to utilize the pathway.

We have also heard variances characterized as an alternative compliance pathway that provide additional flexibility. The enacting legislation established variances to account for actual water used in a service area in order to provide suppliers with a more accurate water use objective. Accurately accounting for water use in a service area is very different than alternative compliance.

RECOMMENDATION # 5. The State Water Board should work collaboratively with ACWA, water suppliers and other interested parties to develop an “Alternative Compliance Pathway” that allows suppliers that have an unreasonable or unattainable water use objective to be eligible for an alternative objective and/or extension of time to comply. This pathway should balance the goals of achieving meaningful water savings and multi-benefits, while considering cost, affordability and suppliers’ good faith effort to offer proactive water use efficiency programs to address indoor and outdoor water use.

IV. ALIGN CII PERFORMANCE MEASURES WITH LOCAL SUCCESS

The draft Regulations' CII PMs should be aligned with existing local and regional CII conservation programs and lessons learned. Most urban retail water suppliers and their regional and statewide partners have extensive experience implementing water use efficiency programs for CII customers. Additionally, CII customer water use will vary significantly among suppliers, and consequently, so will the associated water savings from the overall CII sector and among CII customer types. Currently, the CII PMs impose one size fits all approaches to CII water use efficiency, as described below. We request that the CII PMs provide more flexibility to water suppliers to (1) build on existing local and regional programs, (2) remove prescriptive timelines, and (3) allow suppliers to focus on customers with the greatest water savings potential.

- A. Existing CII Programs: The draft Regulation does not recognize suppliers' and their regional and statewide partners existing water use efficiency programs that have resulted in already efficient mixed-use meters (MUM). Many suppliers offer existing mixed-use meter programs, practices and rebates, which may offer different in-lieu technologies and water management practices to those listed in 973(a)(1) and (2). Rather than impose MUM requirements that will duplicate existing efforts and expend resources without achieving significant additional savings, suppliers should be able to provide a list of existing programs, practices and rebates currently offered as an alternative.

RECOMMENDATIONS # 6. Allow existing CII conservation programs, made available either directly by the supplier or through regional, statewide, or other partnerships, to serve as an alternative to meeting the CII MUM PM requirements currently proposed. Allow suppliers to provide a list and crosswalk of current programs, practices, and rebates to the listed in-lieu technologies and water management programs.

- B. Prescriptive Implementation Schedules: The draft Regulation establishes a deadline to complete each CII PM, which is appropriate. However, the draft Regulation also prescribes a timeline to complete each PM by 20% and 60%. For example, section 972(c) would require that "each supplier shall classify at least twenty percent of its CII customers by 2026, at least sixty percent by 2028, and one hundred percent by 2030." Section 973(c) would require "for commercial, industrial, and institutional large landscapes that have mixed-use meters, suppliers shall make annual progress in either installing dedicated irrigation meters or employing in-lieu water technologies for these large landscapes, with at least twenty percent compliance by 2026, at least sixty percent compliance by 2028 and one hundred percent compliance by 2030." This level of prescription removes suppliers' flexibility to achieve the broader goals cost-effectively and based on their unique CII customers and local conditions, as well as within the context of completing all the various requirements of the draft Regulation.

RECOMMENDATION # 7. Provide flexibility to suppliers to complete implementation of one hundred percent of CII PMs by removing prescriptive timelines. This includes CII classifications, CII MUMs and CII BMPs.

- C. Focused Water Savings: The draft Regulation directs suppliers to implement BMPs for the top 20% of each CII classification. We understand the intent is to target large CII water users to maximize water savings potential. However, this approach may have the unintended impact of steering efforts to CII customers with negligible water use. For example, the Energy Star Portfolio

Manager classification “warehouse/ storage” may account for a very small percent of a suppliers’ CII water use in a service area. However, suppliers would still be required to target customers at or above the 80th percent for water use in that classification category. The draft Regulation should provide flexibility for suppliers, either directly or through regional, statewide, or other partnerships, to develop programs and engage with their CII customers that have water savings potential, which will be driven by characteristics unique to each service area. This prescriptive requirement could impose an unnecessary burden on suppliers for minimal water savings.

We also recommend an exemption for suppliers from the CII BMP PMs whose CII potable water use is less than 10%. This will allow those suppliers to focus efforts and resources on residential actions to maximize water savings.

RECOMMENDATION # 8. Direct suppliers to implement programs, either directly or through regional, statewide, or other partnerships, for CII customers at or above the 80th percentile among all CII customers, rather than by individual CII classification. Additionally, exempt suppliers with less than 10% CII potable water usage, based on a five-year average that is re-evaluated every five years, from BMP requirements.

V. ADHERE TO LEGISLATIVE REQUIREMENTS

Authorizing legislation AB 1668 and SB 606 (2018) (collectively referred to as Conservation Legislation) underwent a year and half of negotiations among diverse interested parties. We have significant concerns that provisions of the draft Regulation either contradict the requirements of the Conservation Legislation or exceed the authority delegated to the State Water Board. Specific concerns and recommendations include:

- A. Existing Landscapes: The Conservation Legislation states that the landscape efficiency factor (LEF) values should reflect a factor that allows for “the amount of water necessary to efficiently irrigate both new and existing landscapes” (Water Code Section 10609.9). The draft Regulation sets efficiency factors for residential use at 0.55 and for non-residential use at 0.45, which are the standards in the MWELO design standards. As detailed in Section 3.1. of this Comment Letter, we have provided data to both DWR and the State Water Board that indicates the proposed LEFs would not support existing landscapes. Because the draft Regulation would set the LEF too low to ensure enough available water for use on existing landscapes, it is inconsistent with the Conservation Legislation.

RECOMMENDATION # 9: Establish a LEF that will support existing and new landscapes.

- B. Irrigable Land: The Conservation Legislation requires outdoor efficiency standards to apply to “irrigable lands” (Wat. Code, § 10609.6 (2)(B)). The draft Regulation does not apply to “irrigable lands” as the statute requires. Instead, the draft Regulation only includes irrigable land that is currently being irrigated in its proposed outdoor standards. Section 968(b)(2)(B) inappropriately limits 20% of the irrigable, but not currently irrigated (INI), landscape area as eligible for inclusion in the objective until 2027, and even then, it is only allowed to be included if the supplier will surpass its objective target without it. Because the draft Regulation does not apply to all irrigable lands, it is inconsistent with the Conservation Legislation.

RECOMMENDATION # 10: Better reflect the statutory language with regards to land area used to calculate the urban water use objectives.

- C. Non-Functional Turf: Section 974(e)(1) of the draft Regulation would ban the irrigation of non-functional turf with potable water by July 1, 2025. This language does not align with AB 1572 (Freidman, 2023), which the Governor signed on October 13, 2023. signature and would not ban the irrigation of non-functional turf for most CII Customers until January 1, 2028. This bill was a collaborative effort that was ultimately supported by a broad array of stakeholders, including ACWA. The language in the draft Regulation is not only unnecessary but would create confusion among water suppliers and CII customers. The draft Regulation is inconsistent with the State Water Board’s authorities within the law.

RECOMMENDATION # 11: Remove non-functional turf provisions from the draft Regulation.

- D. Reporting Year: The Conservation Legislation allows for water suppliers’ calculations to be based on “conditions for the previous calendar or fiscal year.” (Wat. Code § 10609.20, subd. (b).) Section 975 of the draft Regulation would require urban water supply reports to be based on conditions of the previous state fiscal year. A regulation cannot limit flexibility that a statute specifically allows. We additionally note that this is inconsistent with the State Water Board’s adopted Water Loss Regulation, which allows water loss audit reporting on either a fiscal or calendar year. Because the proposed Regulation would require water suppliers to report based on the state fiscal year, it is inconsistent with the Conservation Legislation.

RECOMMENDATION # 12: Allow suppliers to report either calendar year or fiscal year.

- E. Dedicated Funding for DAC: The draft Regulation section 966(i)(2)(e)(iv) would require that suppliers who want to pursue a five-year compliance extension must provide “dedicated funding for the creation and maintenance of climate-ready landscapes, with a minimum of 40 percent of program funds dedicated to low-income households and disadvantaged communities within the supplier’s service area.” This requirement would conflict with the requirements of Proposition 218 funding guidelines. Additionally, the Legislature in the 2022/2023 legislative session discussed this issue when considering Assembly Bill 1072 (Wicks 2023). Because of the issues associated with Proposition 218, the bill was ultimately held on suspense while still in the Assembly.

RECOMMENDATION # 13: Remove funding threshold requirements for low-income and DAC funding from the draft Regulation.

SECTION 3: TECHNICAL CONCERNS & RECOMMENDATIONS

I. OUTDOOR STANDARDS

In ACWA’s March 30, 2023, comment letter to the State Water Board on the draft Regulatory Framework, we provided input on DWR’s three methodologies utilized to develop its recommendation of an ETF of

0.63 by 2030. Additionally, we raised concerns with technical assumptions and policy decisions that underestimated current outdoor residential water use and overestimated feasibility from what is evident through real-world performance.⁶ We support a methodology that is based on real-world performance, horticultural and irrigation science, supports healthy landscapes, and minimizes unintended impacts. We note that detailed recommendations with redlines are provided in the Section 4 Appendix of this Comment Letter. High level recommendations are in bold below, consistent with detailed redlines in the Section 4 Appendix.

As mentioned in Section 2.II. of this Comment Letter, we recommend the State Water Board assess if the observed inequities among inland and coastal communities water use objectives could be attributable to DWR's methodologies for developing the outdoor standards, compounded with local data limitations. Additionally, as noted in Section 2.V. of this Comment Letter, we note the deviation of the draft Regulation from the requirements of the Conservation Legislation. These inconsistencies must be corrected to align the draft Regulation with the requirements of the law.

- A. Methodology Error 1: Horticultural Approach (Assumed 0.8 Irrigation Efficiency) – DWR's horticultural and irrigation science approach assumed 0.8 Irrigation Efficiency (IE). **The draft Regulation should reflect an outdoor residential water use efficiency standard based on an IE that ranges from 0.55 to 0.65**, based on accumulated data from water purveyors on actual irrigation system and performance through the various landscape programs implemented over ten or more years, recently completed field studies by UC Davis (Evapotranspiration Adjustment Factor Study (Agreement #4600008156)), and data by the Irrigation Association.
- B. Methodology Error 2: Statewide ETF Approach (Trimmed Data > 1.0) – DWR “trimmed” all existing landscape data outside of the range of 0.1 to 1.0 ETF because “it is not consistent with MWLEO principles.” 80 percent of homes in California pre-date MWLEO. MWLEO design standards did not start being incorporated into landscape designs until after 2015. Trimming data based on MWLEO design standards excluded existing landscapes prevalent throughout California and is inconsistent with the application of MWLEO. **The draft Regulation outdoor standards should consider all real-world California landscape data to provide an accurate baseline.**
- C. Methodology Error 3: Theoretical Average Approach (Consistency with MWLEO) – DWR analyzed a statewide ETAF by using the age distributions of housing stock and corresponding ETAF from MWLEO Guidelines: 0.8 assumed for pre-1992, 1993 – 2009 assumed 0.8 ETAF, 2010 – 2015 assumed 0.7 ETAF, 2015 to 2020 assumed 0.55 ETAF, and 2021- 2030 assumed 0.55 ETAF. As described above, MWLEO only applies to 20 percent of California's housing stock and developer-installed landscapes. This methodology assumes all homes are compliant with MWLEO, which is fundamentally flawed. **This methodology should not inform the outdoor standards.**
- D. Effective Precipitation – Effective Precipitation is not required by MWLEO (Title 23, Division 2.7, Section 494): “A local agency may consider Effective Precipitation (25% of annual precipitation) in

⁶ [ACWA and Coalition Comment Letter on the Draft Regulatory Framework](#) . March 30, 2023.

tracking water use.” The inclusion of Effective Precipitation in the outdoor standard is inconsistent with real-world irrigation practices. Landscapes are generally not designed to consider effective precipitation since it can be highly variable. Precipitation often falls during winter months when irrigation is not utilized (May through September) and can percolate below the root zone of the plant negating its beneficial effect to that plant’s watering needs. Additionally, precipitation is often not distributed evenly throughout a supplier’s service area. Some areas may receive precipitation and other areas none, making it difficult to apply one effective precipitation rate at the water supplier level. **Effective Precipitation should be removed from the draft Regulation and outdoor standard.**

- E. Landscape Area Measurements – A key concern based on waters suppliers’ verification of LAM data is that residential LAMs are being overestimated and underestimated, which could have a significant impact on suppliers’ outdoor water use standard and overall objective. Improved data quality should be an important goal of the draft Regulation, as inaccurate data will further exacerbate feasibility challenges and sound decision making. **The draft Regulation should include a Data Error Adjustment to recognize data limitations and variability (see Recommendation # 3).**

- F. Irrigable vs. Irrigated – As discussed in Section 2.V of this Comment Letter, the Conservation Legislation requires outdoor efficiency standards to “apply to irrigable lands” (Water Code, § 10609.6 (2)(B)). In accordance with Water Code section 10609.6, DWR conducted a statistical analysis of outdoor water use, LAM and INI data. The data concluded that the INI area is being irrigated at one fifth or 20% of the irrigable area. This 20% should not be viewed as additional, but as area that is actually being irrigated. As a result, DWR correctly recommended that the calculation of annual outdoor water use must include 20% INI. DWR’s findings were also based on the recognition that its analysis was only a snapshot in time and undercounting of irrigated area would continue unless multiple images are conducted over the analysis year. The removal of DWR’s recommendation to include 20% for INI is statistically inaccurate and further exacerbates feasibility challenges with the outdoor standard. **The draft Regulation should reflect DWR’s recommendation with the inclusion of 20 percent INI. Suppliers would recalculate INI when DWR provides new LAM data.**

- G. Temporary Provisions: Recycled Water – Sites irrigated with recycled water generally do not change and are on dedicated irrigation meters (DIM), which suppliers already are required to measure by 2028. The requirement to annually apply for variances and temporary provisions places a significant burden on both State Water Board staff and suppliers. **Recycled water should not be a temporary provision.**

- H. Temporary Provisions: Pools – The residential factor for residential pools should be same as public pools, which is 1.0. Water evaporates at about 1.0. Not allocating enough water to residential pools effectively further reduces the residential outdoor budget. Most pools are not subject to MWLEO, as they are generally in backyards and existing prior to MWLEO. In addition to evaporation, water loss from pools includes splash out and water carried out on swimwear and people. Pool covers are generally not effective. During summer months when pools are

used daily, customers won't use covers. Metropolitan Water District's pool cover rebate program inspections found that many times the covers were in garages and had never been installed.

Residential pools should not be a temporary provision.

- I. MWELo: Newly Constructed Landscapes and Special Landscapes Areas (SLA) – The standards for newly constructed landscapes, including residential and CII landscapes with DIMs, point to factors identified in MWELo. Additionally, the standard for CII landscapes with DIMs that are special landscape areas point to the factor identified in MWELo. MWELo can be modified, which could impact suppliers' compliance with the Regulation and associated costs. Suppliers need certainty as they strive to implement this Regulation in the most cost-effective manner. **The draft Regulation should set these standards as LEFs, rather than refer to MWELo.** Additionally, the draft Regulation would require that suppliers demonstrate the existence of newly constructed landscapes through annual MWELo reporting. Many new residential landscapes are not subject to MWELo or MWELo reporting. MWELo reporting would be incomplete and would not accurately reflect newly constructed residential landscape area. **We request that the draft Regulation include DWR's recommended approaches to account for newly constructed residential and CII DIM landscape areas, which include on-the-ground measurement, remote sensing methods, and using service area level averages.**

II. CII PERFORMANCE MEASURES

A. CII Classification

- i. Energy Star: Suppliers worked closely with DWR to inform its CII Classification PM recommendations. DWR proposed 19 categories, in which they found "these categories are sufficient to address major CII water uses and provide adequate differentiation among different CII sectors to facilitate data collection and future references. However, the system will not be overly detailed to create undue burdens on urban retail suppliers for implementation." The draft Regulation is proposing 22 classifications, 18 Energy Star Portfolio Manager board categories and 4 additional proposed categories. Classifying CII customers will require significant supplier staff time and resources, including making changes to internal billing systems. The CII Classification PMs should be simplified to reduce the burden on suppliers, where possible. **The four additional proposed classifications that deviate from the Energy Star Portfolio Manager broad categories should be removed from the draft Regulation.**
- ii. Schedule for Completion: As discussed in Section 2.IV. of this Comment Letter, we recommend more flexibility be provided to suppliers to complete classifications by 2030. **The draft Regulation should remove schedules for classifying 20% of customers by 2026 and 60% by 2028.**
- iii. Classification of Existing Customers: It is unclear how existing versus new customers are considered within the five-year timeframe to complete all CII classifications. CII classification will be a significant lift for suppliers. Suppliers should focus on completing classifications for a static list of CII customers based on the time of the State Water Board's adoption of the final Regulation. The additional burden of

addressing influxes and changes of CII customers within the first five years of completing classifications could impair suppliers' ability to comply. **The draft Regulation should clarify that the initial classification of CII customers is based on existing customers at the time of the State Water Board's adoption of the Regulation. Suppliers must include any new CII customers after completing the initial classification of all CII customers.**

- iv. State Guidance: As a statewide PM, the State should develop guidance for all suppliers that will support consistent interpretation of SIC and NAICS codes as it applies to each Energy Star Portfolio Manager category. A standardized interpretation will lend itself to better data and overall implementation. **DWR should provide a guide to associate NAICS codes to the respective classification category prior to suppliers' implementing CII classifications.**

B. Large Landscapes with Mixed-Use Meter

- i. Timeline: DWR CII-LAM data will not be delivered until 2026. Suppliers need adequate time to review the data before coming into compliance. To implement this specific PM, suppliers would need to identify actual large landscape water use (e.g., remove the process water to see ACTUAL landscape water usage for CII). The compliance schedule for MUM conversion should account for every customer being a unique and specific project, requiring budget and time to implement, if a physical conversion is taking place. **As discussed in Section 2.I. of this Comment Letter, we request the timeline to complete MUM PM be from 2030 – 2035. Additionally, the draft Regulation should remove schedules for completing 20% of large landscapes by 2026 and 60% by 2028.**
- ii. Recognize Existing Programs: As discussed in Section 2.IV. of this Comment Letter, many suppliers have existing MUM programs, which may offer different in-lieu technologies and water management practices to those listed in 973(a)(1) and (2). **The draft Regulation should allow suppliers' existing CII conservation programs to serve as an alternative to meeting the CII MUM PM requirements currently proposed.**
- iii. "Offer" vs. "Employ:" The draft Regulation requires suppliers to "employ" actions and technologies for large landscapes. The term "employ" implies that suppliers will take up an action on a customer's behalf. Suppliers may offer programs, rebates, incentives and in-lieu technologies, but suppliers cannot require the customer to act or implement in-lieu water use technologies. **The draft Regulation should replace "employ" with "offer" to recognize suppliers' appropriate authorities.**
- iv. Efficient Water Use Technologies & Water Management Practices: We recommend technical changes to the specified water technologies that reflect on-the-ground best practices and actions that are within suppliers' authorities. For example, water suppliers generally do not provide maintenance services for customer irrigation systems or irrigation schedules. That is the responsibility of the customer and could be a liability for suppliers. Additionally, DWR recommended suppliers implement one in-lieu technology. However, the draft Regulation would require suppliers to

implement two in-lieu technologies. Requiring two is duplicative and does not necessarily generate more savings. **The draft Regulation section 973 should be updated to reflect the suggested redlines in the attached Appendix of this Comment letter.**

- v. Quantification of Volume of Water Use on CII MUMs: The draft Regulation would direct suppliers to estimate the volume of water use on CII large landscapes with MUMs. As a PM, suppliers should not be required to quantify MUM water usage, particularly because any quantification is inclusive of process water and the draft Regulation does not provide the appropriate time for suppliers to investigate customer water usage for a compliance determination. **This provision should be removed from the draft Regulation.**

C. Best Management Practices

- i. Disclosable Buildings: The draft Regulation would require suppliers to identify all disclosable buildings in their service area by January 1, 2025 and deliver specified information to each building owner. These requirements would place significant burden on suppliers' limited resources, without providing clear benefits or guaranteeing water savings. Our concerns include: (1) suppliers do not have or maintain square footage information to identify disclosable buildings; (2) square footage is well correlated with energy use, but not necessarily with water use, so this may not be an effective use of limited resources; (3) many suppliers currently provide monthly or bi-monthly water usage to customers in their bill with water use reports, or through an AMI portal. Sending duplicative data to customers, particularly those that will not utilize it, is not good use of suppliers' limited resources, (4) suppliers cannot determine what meter serves which buildings on an owner's parcel. Suppliers can associate meters with an account but they may not know the customer's use. Suppliers can't identify how much water use goes to each building if there are multiple buildings on one meter; and 5) the proposed timelines are not reasonable. **Proposed section 974(a) and (b) should be removed from the draft Regulation.**
- ii. Thresholds and De Minimis CII Water Use: As already discussed in Section 2.IV. of this comment letter, suppliers need flexibility to develop programs and engage with their CII customers that have water savings potential, which will be driven by characteristics unique to each service area. **The draft Regulation should direct suppliers to implement programs for CII customers at or above the 80th percentile among all CII customers, rather than by individual CII classification. Additionally, suppliers with less than 10% CII potable water usage, based on a five-year average, should be exempt from BMP requirements.**
- iii. Non-Functional Turf: As discussed in Section 2.V. of this Comment Letter, Section 974(e)(1) of the draft Regulation would ban the irrigation of non-functional turf with potable water by July 1, 2025, which is inconsistent with State Water Board's pending authority. **This provision should be removed from the draft Regulation.**

- iv. Timelines: As discussed in Section 2.I. of this Comment Letter, we have concerns with the requirement to complete BMPs while suppliers are completing CII Classification. Additionally, consistent with Section 2.IV. of this Comment Letter, suppliers should be able to best determine how to meet the broader BMP PMs requirements based on the unique local characteristics and existing programs. **The draft Regulation timeline should be modified to allow for suppliers to achieve 100 percent compliance with BMP PMs by 2035 and remove percentage completion requirements.**
- v. BMPs: We recommend technical changes to the specified water technologies that reflect on-the-ground best practices and actions that are within the authorities of water suppliers. For example, water suppliers generally do not provide maintenance services for customer irrigation systems or irrigation schedules. Additionally, we recommend AMI be specifically included. **The draft Regulation section 974 should be updated to reflect the suggested redlines in the attached Appendix of this Comment Letter.**

D. Methodologies & Variances

- i. Compliance & Alternative Compliance: As discussed extensively in Section 2.I., II., and III. of this Comment Letter, we are requesting changes to compliance provisions of the draft Regulation. We believe these changes preserve the intent of the draft Regulation to advance meaningful water use efficiency. **The draft Regulation should incorporate our recommendations that modify the timelines of the outdoor standards and CII PMs, include the DEA, and establish an Alternative Compliance Pathway.**
- ii. Variance Threshold: The draft Regulation currently proposes that an individual variance must represent 5% or more of the sum of a water supplier's budget. This threshold fails to recognize the cumulative impact unique water uses could have on suppliers' ability to comply with their water use objectives. Additionally, the five percent threshold could significantly restrict the ability of water suppliers that have unique water uses. The Conservation Legislation requires the State Water Board to establish appropriate variances for unique uses that can have a material effect on water use of an urban retail water supplier. Variances are not a "bonus" or "alternative compliance" mechanism. Variances are intended to provide suppliers with an accurate water use objective. **The draft Regulation should establish a cumulative threshold for variances of 5%.**
- iii. Variance Frequency: We are concerned the currently proposed variance pathway would be too onerous and expensive to an extent that would deter small to mid-sized agencies from seeking variances. The draft Regulation currently requires suppliers to submit requests for variances annually. Requiring annual submittal and approval of the variances would place a significant administrative burden on both suppliers and State Water Board staff and does not help advance actual water use efficiency. **The draft Regulation should allow for a suppliers' approved variance(s) be valid for five years.**

- iv. **Reporting:** The State Water Board should ensure that water suppliers' limited resources are not being shifted to complying with burdensome reporting requirements, rather than working with customers to achieve water savings. The State Water Board should consider the goals of AB 1755, the Open and Transparent Water Data Act, and AB 1668 requirements under Water Code Section 10609(c)(4), which direct the State to identify opportunities for streamlined reporting, eliminate redundant data submissions, and incentivize open access to data collected by urban and agricultural water suppliers, and the overall usefulness of data requested. We have concerns with the duplicative reporting to both DWR and the State Water Board. We think that state agencies should share datasets, rather than require duplicative reporting. Additionally, as noted in Section 2.V. of this Comment Letter, we have concerns with the removed flexibility for water suppliers to report on a fiscal year or calendar year. **We encourage the State to partner with the California Data Collaborative and California Water Data Consortium to identify strategies for streamlining data reporting and minimizing data quality concerns that would go into effect once the final Regulation is adopted.**

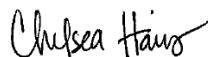
SECTION 4: APPENDIX: REDLINE RECOMMENDATIONS

The included Appendix of the Comment Letter provides detailed suggested redline changes to the draft Regulation. We recognize the suggested redlines are one of many ways in which the draft Regulation could be modified to address suppliers' concerns. ACWA is committed to working with State Water Board staff on revisions that support both the State goals and water suppliers' successful implementation of the Regulation.

SECTION 5: CLOSING REMARKS

We appreciate the opportunity to provide these written comments to the State Water Board on the draft Regulation. We ask for the opportunity to work collaboratively with the State Water Board over the duration of the rulemaking to revise the draft Regulation to incorporate input from interested parties to support successful local and regional implementation. Please do not hesitate to contact me at ChelseaH@acwa.com or (916) 206-4078 if you have any questions regarding our input.

Sincerely,



Chelsea Haines
Regulatory Relations Manager
Association of California Water Agencies

Alameda County Water District
American Water Works Association CA-NV
Association of California Water Agencies
Bay Area Water Supply & Conservation Agency

BellFlower-Somerset Mutual Water Company
California American Water
California Municipal Utilities Association
California Special Districts Association
California Water Association
Calleguas Municipal Water District
Camrosa Water District
Carmichael Water District
Casitas Municipal Water District
Citrus Heights Water District
City of Banning
City of Brea
City of Colton
City of Corona Utilities Department
City of Fountain Valley
City of Fullerton
City of Garden Grove
City of La Habra
City of La Verne
City of Oceanside
City of Newport Beach
City of Redding
City of Roseville
City of Sacramento
City of San Diego Public Utilities Department
City of Seal Beach
City of Shasta Lake
City of Susanville
City of Tustin
City of West Sacramento
City of Yuba City
Coachella Valley Water District
Contra Costa Water District
Cucamonga Valley Water District
Desert Water Agency
Diablo Water District
East Orange County Water District
East Valley Water District
Eastern Municipal Water District
El Dorado Irrigation District
El Toro Water District
Elk Grove District
Elsinore Valley

Georgetown Divide Public Utility District
Golden State Water Company
Gradient Water
Helix Water District
Indio Water Authority
Inland Empire Utilities Agency
Jurupa Community Services District
Laguna Beach County Water District
Lake Hemet Municipal Water District
Las Virgenes Municipal Water District
Liberty Utilities
Long Beach Utilities Department Logo
Marina Coast Water District
Mesa Water District
Metropolitan Water District of Southern CA
Mid-Peninsula Water District
Mission Springs Water District
Monte Vista Water District
Montecito Water District
Municipal Water District of Orange County
Orchard Dale Water District
Otay Water District
Padre Dam Municipal Water District
Palmdale Water District
Rancho CA Water District
Rosamond Community Services District
Regional Water Authority
Rowland Water District
Sacramento County Water Agency
Sacramento Suburban Water District
San Diego County Water Authority
San Gabriel Valley Water Company
Santa Clarita Valley Water Agency
Santa Fe Irrigation District
Santa Margarita Water District
Santa Rosa Water
South Coast Water District
South Tahoe Public Utility District
Sweetwater Authority
Tahoe City Public Utility District
Three Valleys Municipal Water District
Trabuco Canyon Water District
Triunfo Water & Sanitation District

Truckee Donner Public Utility District
Tuolumne Utilities District
Vallecitos Water District
Valley Center Municipal Water District
Walnut Valley Water District
West Basin Municipal Water District
West Kern Water District
West Valley Water District
Western Canal Water District
Western Municipal Water District
Yorba Linda Water District

CC: The Honorable E. Joaquin Esquivel, Chair, State Water Resources Control Board
The Honorable Dorene D'Adamo, Vice Chair, State Water Resources Control Board
The Honorable Laurel Firestone, State Water Resources Control Board
The Honorable Sean Maguire, State Water Resources Control Board
The Honorable Nichole Morgan, State Water Resources Control Board Ms. Eileen Sobeck,
Executive Director, State Water Resources Control Board
Mr. Eric Oppenheimer, Deputy Director, State Water Resources Control Board
Mr. James Nachbaur, Director, Office of Research, Planning and Performance, State Water
Resources Control Board
Ms. Charlotte Ely, Supervisor, Conservation and Efficiency, State Water Resources Control Board
Mr. Dave Eggerton, Executive Director, Association of California Water Agencies
Ms. Cindy Tuck, Deputy Director, Association of California Water Agencies

APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS
CII PERFORMANCE MEASURES

Reg Sec.	Sub. Sec.	Topic	Current Regulatory Text	Concern	Recommendation	Suggested Redline
965	(ee)	Definitions	(ee) "In-Lieu Technologies" are technologies that improve landscape water use efficiency by means other than the direct measure of water use. They include but are not limited to best management practices, audits, efficient irrigation devices, or irrigation budgets.	Some in-lieu technologies may not result in actual water savings, but can provide benefits (e.g., better data). The currently proposed definition for "in lieu technologies" is limited to technologies that improve water use efficiency.	Clarify that in-lieu technologies are technologies that aid in managing landscape water use.	(ee) "In-Lieu Technologies" are technologies that aid in managing improve landscape water use efficiency by means other than the direct measure of water use. They include but are not limited to best management practices, audits, efficient irrigation devices, or irrigation budgets.
965	NA	Definitions	NA	The proposed CII Performance Measures do not recognize suppliers existing water use efficiency programs and existing water use efficiency. Most suppliers have robust CII water efficiency programs that have resulted in meaningful savings within the CII sector. The Regulation should provide flexibility to local suppliers to build on existing programs and successes to avoid duplicative programs that may not be as effective at achieving water savings.	Add a definition for "Existing CII Conservation Program"	(iii) "Existing CII Conservation Program" is a program or set of programs currently offered or implemented by an urban retail water supplier or regional entity. Existing programs should be designed to achieve CII sector water use savings as a result of program element implementation, be adaptively managed by the supplier, and contain at least three of the major BMP categories identified in Section 974.
972	(b)	Classification -	(a) Urban retail suppliers shall annually classify commercial, industrial and institutional customers in accordance with Energy Star Portfolio Manager's broad categories. (b) In addition to Energy Star Portfolio Manager's broad categories, suppliers shall identify every CII customer associated with: (1) CII laundries (2) Large landscapes (3) Water recreation (4) Car wash. For every CII customer that operates a car wash in addition to its primary service and for which the car wash accounts for the majority of that customer's water use, the supplier shall also identify the customer's Energy Star Portfolio Manager property type.	Suppliers worked closely with the Department of Water Resource (DWR) to inform its CII Classification Performance Measure recommendations. DWR proposed 19 categories, in which they found "these categories are sufficient to address major CII water uses and provide adequate differentiation among different CII sectors to facilitate data collection and future references. However, the system will not be overly detailed to create undue burdens on urban retail suppliers for implementation." The draft Regulation is proposing 22 classifications, 18 Energy Star Portfolio Manager board categories and 4 additional proposed categories. Classifying CII customers will require significant supplier staff time and resources, including making changes to internal billing systems. The CII Classification Performance Measures should be simplified to reduce the burden on suppliers, where possible. Specifically, the four additional proposed classifications that deviate from Energy Star will place an additional burden on suppliers, without clear benefit or water savings.	Make classifications consistent with the Energy Star Portfolio Manager. Strike the additional four categories.	(a) Urban retail suppliers shall annually classify commercial, industrial and institutional customers in accordance with Energy Star Portfolio Manager's broad categories. (b) In addition to Energy Star Portfolio Manager's broad categories, suppliers shall identify every CII customer associated with: (1) CII laundries (2) Large landscapes (3) Water recreation (4) Car wash. For every CII customer that operates a car wash in addition to its primary service and for which the car wash accounts for the majority of that customer's water use, the supplier shall also identify the customer's Energy Star Portfolio Manager property type.
972	(c)	Classification	(c) Each supplier shall classify at least twenty percent of its CII customers by 2026, at least sixty percent by 2028, and one hundred percent by 2030. After 2030, the supplier shall maintain at least a 95% classification rate, as measured on an annual basis.	It is unclear how existing versus new customers are considered within the 5-year timeframe to complete all CII classifications. CII classification will be a significant lift for suppliers. Suppliers should focus on completing classifications for a static list of CII customers based on the time of the State Water Board's adoption of the Regulation. The additional burden to address influxes and changes of CII customers within the first five years of completing classifications could impair suppliers ability to comply.	Clarify that the initial classification of CII customers is based on existing customers at the time of the Board's adoption of the Regulation. Any new CII customers will be included once suppliers have completed their initial classification of all customers.	(c) Each supplier shall classify existing at least twenty percent of its CII customers by 2026, at least sixty percent by 2028, and one hundred percent of its CII customers by 2030. After 2030, the supplier shall maintain at least a 95% classification rate including any new CII customers , as measured on an annual basis.
972	(c)	Classification - Alternative Schedule	Same as above	CII customers among suppliers' service areas vary significantly. It may be more cost-effective or locally appropriate to complete all CII customer classification on a schedule different than the proposed Regulation.	Provide flexibility to suppliers to complete one hundred percent classification of CII customers by 2030. Remove prescriptive timeline requirements on how to complete one hundred percent classification.	(eb) Each supplier shall classify existing at least twenty percent of its CII customers by 2026, at least sixty percent by 2028, and one hundred percent by 2030. After 2030, the supplier shall maintain at least a 95% classification rate, including any new CII classification customers , as measured on an annual basis.
972	NA	Classification - State Guidance	NA	As a statewide performance measure, the State should develop guidance to all suppliers that will support consistent interpretation of SIC and NAICS codes as it applies to each Energy Star Portfolio Manager category. A standardized interpretation will lend itself to better data and overall implementation.	DWR should provide a guide to associate NAICS codes to the respective classification category prior to suppliers' implementing CII classifications.	(d) The Department will provide a guidance document to suppliers for classifying all SIC and NAICS codes within each broad Energy Star Portfolio Manager category no later than 2025.

APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS
CII PERFORMANCE MEASURES

973	(a)	Mixed Use Meters - Exemptions	NA	The draft Regulation does not recognize suppliers' existing water use efficiency programs and practices and already efficient mixed-use meters. DWR's recommendations included 'Qualified Conditions and Exemptions,' that suggested narrowly defined exemptions from the mixed-use meter conversion requirements and implementation of the conversion threshold Performance Measure. The Regulation should support suppliers' existing successful program, and reduce requirements that will not achieve significant water savings but will require suppliers' to invest significant resources.	Include DWR's recommendations 'Qualified Conditions and Exemptions' (Recommendations for Dedicated Irrigation Meter Conversion...4-3). Clarify that these exempt landscapes are not required to meet the in-lieu water management practices for communications, system maintenance, and irrigation scheduling as they would already be considered implementing the In-Lieu Technologies Performance Measures. Additionally, include language to allow suppliers to submit a list of current programs, practices and rebates as an alternative to (973)(a)(1) and (2).	(3)Commercial, industrial, and institutional mixed use meters that meet the following criteria shall be considered exempt from the requirements of Section 973(a)(1) & 973(a)(2): (A) Landscapes exempt under MWEL0 (B) Non-irrigation water usage of no more than 5% of total water use (C) CII landscapes irrigated with a mixed-use meter and the estimated landscape water use satisfy the requirements of the landscape efficiency factors listed in Section 969, as appropriate, on a per-parcel basis, are considered to be implementing the In-Lieu Technologies PM and therefore exempt. (D) Suppliers may provide a list and crosswalk of current programs, practices, and rebates to listed in-lieu technologies and water management practices to satisfy programmatic requirements of 973(a)(1) and (2).
973	(a) and (c)	Mixed Use Meters - Employ	(a) same as above (c) For commercial, industrial, and institutional large landscapes that have mixed-use meters, suppliers shall make annual progress in either installing dedicated irrigation meters or employing in-lieu water technologies for these large landscapes, with at least twenty percent compliance by 2026, at least sixty percent compliance by 2028, and one hundred percent compliance by 2030. After 2030, the supplier shall ensure at least 95% of large landscapes either have a dedicated irrigation meter installed or are employing in-lieu water technologies, as assessed on an annual basis.	The draft Regulation requires suppliers to "employ" actions and technologies for large landscapes. The term "employ" implies that suppliers will take up an action on a customer's behalf. Suppliers may offer programs, rebates, incentives and in-lieu technologies, but suppliers cannot require the customer to act or implement in-lieu water use technologies. The final Regulation must recognize suppliers' appropriate authorities	Replace "employ" with "offer."	(a)(1) Suppliers shall employ offer for large landscapes that do not have DIMs at least two of the following efficient water use technologies: (2) Suppliers shall employ offer the following water management practices for large landscapes that do not have DIMs: (c)For commercial, industrial, and institutional large landscapes that have mixed-use meters, suppliers shall make annual progress in either installing dedicated irrigation meters or employing in-lieu water technologies for these large landscapes, with at least twenty percent compliance by 2026, at least sixty percent compliance by 2028, and one hundred percent compliance by 2030. After 2030, the supplier shall ensure at least 95% of large landscapes either have a dedicated irrigation meter installed or are employing offering in-lieu water technologies, as assessed on an annual basis.
973	(a)(1)	Mixed Use Meters - In-Lieu	(1) Suppliers shall employ for large landscapes that do not have DIMs at least two of the following efficient water use technologies:	DWR assessed and recommended a list of in-lieu technologies. DWR's recommendation did not require two in-lieu technologies to be implemented. Requiring two is duplicative and does not necessarily generate more savings.	Adopt DWR's recommendation that only 1 in-lieu technology be required.	(a)(1) Suppliers shall employ for large landscapes that do not have DIMs at least two one of the following efficient water use technologies:
973	(a)(1)(C)	Mixed Use Meters - In-Lieu	(C) Hardware improvements with enhanced performance and functions, including but not limited to metering technologies that allow suppliers to identify outdoor water use, smart irrigation controllers and pressure-regulated sprinkler spray heads.	"Hardware improvements" excludes software improvements, which can also aid in improving efficiency.	Include software improvements as an efficient water use technology.	(C) Hardware and software improvements with enhanced performance and functions, including but not limited to metering technologies that allow suppliers or customers to identify outdoor water use, smart irrigation controllers and pressure-regulated sprinkler spray heads.
973	(a)(1)(E)	Mixed Use Meters - In-Lieu	(E) Landscape plant palette transformation programs, including green infrastructure such as swales or rain gardens that both reduce wet-weather runoff as well as offset irrigation needs	The requirement for green infrastructure that reduces wet-weather runoff and offsets irrigation needs in order to participate in lawn conversion programs could decrease participation.	It should be clarified that green infrastructure and swales and rain gardens aren't requirements for a lawn conversion program.	(E) Landscape plant palette transformation programs, which may include including green infrastructure such as swales or rain gardens that both reduce wet-weather runoff as well as offset irrigation needs
973	(a)(2)(B)	Mixed Use Meters - In-Lieu	(2) Suppliers shall employ the following water management practices for large landscapes that do not have DIMs: (A) Communications (B) Irrigation systems maintenance (C) Irrigation scheduling	Suppliers generally do not provide maintenance services for customer irrigation systems or irrigation schedules. That's the responsibility of the customer and could be a liability for suppliers.	Revise language to recognize what is within the purview of suppliers.	(A) Communications (B) Irrigation systems maintenance guidance (C) Irrigation scheduling guidance

APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS
CII PERFORMANCE MEASURES

973	(b)	Mixed Use Meters - Quantification	(b)(1) Urban retail water suppliers shall estimate the volume of water used on commercial, industrial, and institutional landscapes with mixed-use meters (CIIMUM) by multiplying the area of those landscapes (LALL) by net reference evapotranspiration (Net ETO), by a Landscape Efficiency Factor of 0.76, and by a unit conversion factor of 0.62. This formula is expressed mathematically as follows: $CIIMUM = LALL \times Net\ ETO \times 0.76 \times 0.62$ (2) For purposes of this section, the area of the landscapes (LALL) shall include only landscapes associated with CII that have mixed-use meters and shall be quantified and substantiated by the supplier using data generated by the Department.	As a performance measure, suppliers should not be required to quantify mixed use meter water usage, particularly because any quantification is inclusive of process water and the Regulation does not provide the appropriate time for suppliers to investigate customer water usage for a compliance determination.	Strike this section.	(b) (1) Urban retail water suppliers shall estimate the volume of water used on commercial, industrial, and institutional landscapes with mixed-use meters (CIIMUM) by multiplying the area of those landscapes (LALL) by net reference evapotranspiration (Net ETO), by a Landscape Efficiency Factor of 0.76, and by a unit conversion factor of 0.62. This formula is expressed mathematically as follows: $CIIMUM = LALL \times Net\ ETO \times 0.76 \times 0.62$ (2) For purposes of this section, the area of the landscapes (LALL) shall include only landscapes associated with CII that have mixed-use meters and shall be quantified and substantiated by the supplier using data generated by the Department.
973	(c)	Mixed Use Meters-Timeline	(c) For commercial, industrial, and institutional large landscapes that have mixed-use meters, suppliers shall make annual progress in either installing dedicated irrigation meters or employing in-lieu water technologies for these large landscapes, with at least twenty percent compliance by 2026, at least sixty percent compliance by 2028, and one-hundred percent compliance by 2030. After 2030, the supplier shall ensure at least 95% of large landscapes either have a dedicated irrigation meter installed or are employing in-lieu water technologies, as assessed on an annual basis.	DWR CII-LAM data wont be delivered until 2026. Suppliers need adequate time to review the data and come into compliance. To implement this specific performance measure, suppliers would need to identify actual large landscape water use (e.g., remove the process water to see ACTUAL landscape water usage for CII) prior to implementation. The compliance schedule for MUM conversion should account for every customer being a unique and specific project, requiring budget and taking time to implement if a physical conversion is taking place. Additionally, we note general concerns with stacking all the CII Performance Measures on an overlapping 5-year compliance schedule.	Extend the 5-year timeline to complete mixed-use meter performance measures in order to provide time for suppliers' to review DWR CII-LAM data and complete CII Classifications. This will help reduce the resource burden on suppliers' of the compressed timeline to allow suppliers to more meaningfully engage with customers on in-lieu and meter conversion efforts.	(c) For commercial, industrial, and institutional large landscapes that have mixed-use meters, suppliers shall make annual progress in either installing dedicated irrigation meters or employing in-lieu water technologies for these large landscapes, with at least twenty percent compliance by 2026 31 , at least sixty percent compliance by 2028 33 , and one-hundred percent compliance by 2030 35 . After 2030 5 , the supplier shall ensure at least 95% of large landscapes either have a dedicated irrigation meter installed or are employing offering in-lieu water technologies, as assessed on an annual basis.
973	(c)	Mixed Use Meters-Timeline	Same as above	It may be more cost-effective or locally appropriate to complete all MUM Conversion Performance Measures on a schedule different than the proposed Regulation.	Provide flexibility for suppliers to complete the 100 percent compliance within the 5 years, rather than twenty percent timeline. Allow supplier to submit an alternative schedule to the State Water Board that identifies how it will complete the performance measure within the 5 years.	(d) A supplier may submit to the Board by 2031 an alternative compliance schedule to either install dedicated irrigation meters of employ in-lieu water technologies for one-hundred percent of large landscapes customers by 2035, as an alternative to 973(c).

APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS
CII PERFORMANCE MEASURES

974	(a)	BMPs - Disclosable Buildings	(a) Each supplier shall identify all disclosable buildings in their service area by January 1, 2025. (b)(1) For every customer for which the square footage of its building meets the definition of a disclosable building in section 1681 of the California Code of Regulations at title 20, a supplier shall complete the following: (A) For each meter, the supplier shall deliver to the building owner or Owner's Agent the last four characters of the meter serial number serving the building. (B) For each meter, the supplier shall identify, aggregate, and provide all water use data, in monthly intervals, for at least the previous calendar year, and all available data for the calendar year in which data is requested, by one of the following methods: (i) Suppliers not using ENERGY STAR Portfolio Manager's Data Exchange Services shall send the data to the building owner or Owner's Agent using the template provided by ENERGY STAR Portfolio Manager. (ii) Suppliers using ENERGY STAR Portfolio Manager's Data Exchange Services shall provide the data by direct upload to the building owner's or Owner's Agent's ENERGY STAR Portfolio Manager account, or, at the building owner's or Owner's Agent's request, send the data to the building owner or Owner's Agent using the template provided by ENERGY STAR Portfolio Manager. (2) Suppliers shall make annual progress in providing the information in paragraph (1) to the owners or Owner's Agents of disclosable buildings and shall provide the information for at least twenty percent of disclosable buildings by 2026, at least sixty percent by 2028, and one hundred percent by 2030.	This section would place significant burden on suppliers' limited resources, without providing clear benefits or guaranteeing water savings. Concerns include: (1) Suppliers do not have or maintain square footage information to identify disclosable buildings. (2) Square footage is well correlated with energy use, but not necessarily with water use, so this may not be an effective use of limited resources. (3) Many suppliers currently provide monthly (or bi-monthly) water usage to customers in their bill with water use reports, or through an AMI portal. This effort would be redundant. Sending duplicative data to customers, particularly those that will not utilize it, is not good use of suppliers' limited resources. (4) Suppliers cannot determine what meter serves which buildings on an owner's parcel. Suppliers can associate meters with an account but they may not know the he customer's use and cannot identify how much water use goes to each building if there are multiple buildings on the meter. (5) Proposed timelines are not reasonable.	Strike this language.	(a) Each supplier shall identify all disclosable buildings in their service area by January 1, 2025. (b)(1) For every customer for which the square footage of its building meets the definition of a disclosable building in section 1681 of the California Code of Regulations at title 20, a supplier shall complete the following: (A) For each meter, the supplier shall deliver to the building owner or Owner's Agent the last four characters of the meter serial number serving the building. (B) For each meter, the supplier shall identify, aggregate, and provide all water use data, in monthly intervals, for at least the previous calendar year, and all available data for the calendar year in which data is requested, by one of the following methods: (i) Suppliers not using ENERGY STAR Portfolio Manager's Data Exchange Services shall send the data to the building owner or Owner's Agent using the template provided by ENERGY STAR Portfolio Manager. (ii) Suppliers using ENERGY STAR Portfolio Manager's Data Exchange Services shall provide the data by direct upload to the building owner's or Owner's Agent's ENERGY STAR Portfolio Manager account, or, at the building owner's or Owner's Agent's request, send the data to the building owner or Owner's Agent using the template provided by ENERGY STAR Portfolio Manager. (2) Suppliers shall make annual progress in providing the information in paragraph (1) to the owners or Owner's Agents of disclosable buildings and shall provide the information for at least twenty percent of disclosable buildings by 2026, at least sixty percent by 2028, and one hundred percent by 2030.
974	(c)	BMPs - Thresholds	(c) For those customers at or above the 80th percentile for water use in each of the classification categories described in section 972, excluding process water, each supplier shall, by January 1, 2025, design and implement a conservation program that includes at least one of the best management practices from each of paragraphs (1) through (5):	Suppliers need flexibility to develop programs and engage with their CII customers that have water savings potential, which will be driven by characteristics unique to each service area. Additionally, some CII classifications may have de minimis water use or are already efficient. The proposed methodology that suppliers' target the top 20% of water users for each CII classification is too prescriptive, ignores existing local and regional programs and efforts, and limits suppliers' ability to cost-effectively target customers with the greatest water savings potential.	Direct suppliers to implement programs for CII customers at or above the 80th percentile among all CII customers, rather than by individual CII classification.	(c) For those CII customers at or above the 80th percentile for water use in each of the among all CII customers classification categories described in section 972, excluding process water, each supplier shall, by January 1, 2025 35 , existing or new design and implement a CII existing or new design and implement a CII conservation programs that includes at least one of the best management practices from each of paragraphs (1) through (5):
974	(c)	BMPs - Clarification	(c) For those customers at or above the 80th percentile for water use in each of the classification categories described in section 972, excluding process water, each supplier shall, by January 1, 2025, design and implement a conservation program that includes at least one of the best management practices from each of paragraphs (1) through (5):	Language that requires suppliers to "offer" programs could be interpreted to not allow for regional, statewide or other partnerships that could help, cost-effectively achieve the CII BMP Performance Measures. We believe this is not the intent.	Make explicit that a supplier can comply with CII BMP Performance Measures by making programs available directly, or through regional, statewide or other partnerships.	(c) For those CII customers at or above the 80th percentile for water use in each of the among all CII customers classification categories described in section 972, excluding process water, each supplier shall, by January 1, 2025 30 , make available, either directly or through regional, statewide or other partnerships, existing or new design and implement a CII make available, either directly or through regional, statewide or other partnerships, existing or new design and implement a CII conservation programs that includes at least one of the best management practices from each of paragraphs (1) through (5):
974	(c)	BMPs - Clarification	(c) For those customers at or above the 80th percentile for water use in each of the classification categories described in section 972, excluding process water, each supplier shall, by January 1, 2025, design and implement a conservation program that includes at least one of the best management practices from each of paragraphs (1) through (5):	The Regulation does not explicitly state that a single conservation program can satisfy the requirements for more than one BMP. We believe that is the intent, rather than requiring individual programs for each classification.	Make explicit that a single conservation program can apply to multiple BMPs.	(h) A single conservation program may satisfy the requirements for more than one best management practice from each of paragraphs (1) through (5) in subdivision (c).
974	(c)(1)(A)	BMPs - Clarification	(c)(1)(A) Direct contacts via site visits or phone calls	Suppliers may rely on other means of direct communication with customers, such as emails, video calls and direct mail. This provision should be broadened to allow other means of direct communication that suppliers' currently deploy.	Clarify language to include email, video calls and direct mail.	(c)(1)(A) Direct contacts via site visits, emails, video calls, direct mail , or phone calls
974	(c)(2)(A)	BMPs - Clarification	(c)(2)(A) Rebates and cost-sharing for replacing inefficient fixtures, equipment, irrigation systems or landscapes with water efficient ones	Innovative non-rebate incentives like financing are not included. These help advance water savings among CII Customers.	Make explicit that financing, cost-sharing and other innovative non-rebat incetnvies are eligible.	(c)(2)(A) Rebates, financing, cost-sharing and other innovative non-rebate incentives and cost-sharing for replacing inefficient fixtures, equipment, irrigation systems or landscapes with water efficient ones

APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS
CII PERFORMANCE MEASURES

974	(c)(2)(A)	BMPs - Clarification	(2) Incentive best management practices.	Water-budget based rate structures and water budget-based management programs without a rate structure are not recognized. These help advance water savings among CII Customers.	Explicitly include water-budget based rate structures and water-budget based management programs without a rate structure are included in the "Incentive best management practices."	(D) Water budget-based rate structures (E) Water budget-based management program without a rate structure
974	(c)(3)(D)	BMPs - Clarification	(3) Landscape best management practices. (A) Landscape and irrigation management practices to promote improved water use efficiency (B) Irrigation system inspection and maintenance (C) Irrigation scheduling and maintenance training	It would be inappropriate for suppliers to maintain irrigation systems.	Remove language for suppliers to maintain CII customer irrigation systems, and instead include irrigation system maintenance training as a BMP.	(3) Landscape best management practices. (A) Landscape and irrigation management practices to promote improved water use efficiency (B) Irrigation system inspection and maintenance (C) Irrigation scheduling and maintenance training
974	(c)(3)(D)	BMPs - Clarification	(c)(3)(D) New development landscape inspection, workshops, and training	Landscape inspections, workshops and trainings should not be limited to new development.	Include new and existing landscapes as eligible.	(c)(3)(D) New development - Landscape inspection, workshops, and training
974	(c)(3)(F)-(H)	BMPs - Clarification	(F) Programs to remove turf and replace it with climate-ready vegetation (G) Programs to decrease urban heat and reduce turf water use by planting trees (H) Programs to install green infrastructure such as swales or rain gardens that both reduce wet-weather runoff as well as offset irrigation needs		Remove these options as landscape BMPs.	(F) Programs to remove turf and replace it with climate-ready vegetation water efficient plants, a sustainability feature designed to capture rainwater and reduce runoff, and a low application rate irrigation system. Most exposed soils must be covered with mulch (G) Programs to decrease urban heat and reduce turf water use by planting trees (H) Programs to install green infrastructure such as swales or rain gardens that both reduce wet-weather runoff as well as offset irrigation needs.
974	(c)(5)(A)	BMPs - Clarification	(5) Operational best management practices. (A) Infrastructure changes (for example, smart meter replacement programs)	AMI is not included. AMI improves suppliers ability to collect accurate water usage data to detect leaks and improve water management.	Explicitly recognize AMI.	(5) Operational best management practices. (A) Infrastructure changes (for example, smart meter replacement programs, Automatic Meter Infrastructure (AMI))
974	(d)	BMPs	(d) For those commercial, industrial, and institutional customers that are at or above the 97.5th percentile for water use, excluding process water, each supplier shall, by January 1, 2025, design and implement a conservation program that includes at least two of the best management practices from each of paragraphs (1) through (5) in subdivision (c).	Customers at or above the 97.5th percentile for water use are already encompassed in the top 20% requirements of section 974(c). As proposed, this requirement does not recognize suppliers' current efforts to develop custom programs, in which these customers may already be efficiently using water. Additionally, conservation programs need to be offered broadly, not just limited to specific customers.	Strike this language. See section 974(c).	(d) For those commercial, industrial, and institutional customers that are at or above the 97.5th percentile for water use, excluding process water, each supplier shall, by January 1, 2025, design and implement a conservation program that includes at least two of the best management practices from each of paragraphs (1) through (5) in subdivision (c).
974	(e)(1)	Non-functional turf	(e) (1) Each urban retail water supplier shall ban the irrigation of non-functional turf with potable water on all commercial, industrial, and institutional (CII) landscapes in its service area by July 1, 2025. (2) Notwithstanding paragraph (1), a supplier is not required to ban the irrigation of nonfunctional turf on CII landscapes in its service area that is necessary to ensure the health of trees and other perennial non-turf plantings or that is necessary to address an immediate health and safety need. (3) Notwithstanding paragraph (1), a supplier may approve a request for continued irrigation of non-functional turf where the user certifies that the turf is a low water use plant with a plant factor of 0.3 or less, and demonstrates the actual use is less than 40% of reference evapotranspiration. (4) For purposes of this subdivision, CII landscapes include homeowners' associations, common interest developments, community service organizations, and other similar entities but do not include the residences of these entities' members or separate interests, as defined in section 4185 of the Civil Code.	This language does not align with AB 1572, which is currently pending the Governor's signature. If the Governor signs AB 1572, this language will not be necessary and its continued inclusion will cause confusion for suppliers and CII Customers.	Strike this language.	(e) (1) Each urban retail water supplier shall ban the irrigation of non-functional turf with potable water on all commercial, industrial, and institutional (CII) landscapes in its service area by July 1, 2025. (2) Notwithstanding paragraph (1), a supplier is not required to ban the irrigation of nonfunctional turf on CII landscapes in its service area that is necessary to ensure the health of trees and other perennial non-turf plantings or that is necessary to address an immediate health and safety need. (3) Notwithstanding paragraph (1), a supplier may approve a request for continued irrigation of non-functional turf where the user certifies that the turf is a low water use plant with a plant factor of 0.3 or less, and demonstrates the actual use is less than 40% of reference evapotranspiration. (4) For purposes of this subdivision, CII landscapes include homeowners' associations, common interest developments, community service organizations, and other similar entities but do not include the residences of these entities' members or separate interests, as defined in section 4185 of the Civil Code.

APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS
CII PERFORMANCE MEASURES

974	(f)	BMPs - Timeline	(f) Suppliers shall make annual progress in meeting the requirements of subdivisions (c) and (d), with compliance of at least twenty percent by 2026, at least sixty percent by 2028, and one hundred percent by 2030.	We are proposing the CII Classification Performance Measure be completed between 2025 – 2030 and CII Mixed-Use Meter and CII BMP Performance Measures be completed 2030 – 2035. The currently proposed completion of all of the CII Performance Measures within the proposed five-year period, beginning 2025, would require significant resources and create implementation challenges. For example, it is unclear how suppliers would accurately implement BMPs for the top 20% of each classification while classifying CII customers. Unstacking the CII BMPs from the CII Classification will allow suppliers to spread limited resources over a 10 year period, while still meeting the goals of the Regulation. Additionally, the prescribed schedule for completing 20% of BMPs annually unnecessarily limits suppliers flexibility. Suppliers should be able to best determine how to meet the broader BMP Performance Measure requirements based on the unique local characteristics and existing programs.	Modify the timeline for suppliers to achieve 100 percent compliance with BMP Performance Measures by 2035. Remove prescriptive requirements of a percentage completion of CII BMP Performance Measures by years.	(f) Suppliers shall make annual progress in meeting the requirements of subdivisions (c) and (d), with compliance of at least twenty percent by 2026, at least sixty percent by 2028, and one hundred percent compliance with subdivision (c) by 2035. After 2035, the supplier shall ensure at least 95% compliance, as assessed on an annual basis.
974	NA	BMPs - De Minimis	NA	Some suppliers have a very small amount of CII water usage. Consequently, the amount of effort required in this section will not yield meaningful water savings. We encourage the Regulation to recognize suppliers with de minimis CII water use, which should be less than 10% of total potable water usage, and exclude those suppliers from the requirements of this section. This will allow those suppliers to focus their resources where they better advance water use efficiency.	Exemption suppliers with less than 10% CII potable water usage from section 974.	(g) Suppliers with less than 10% CII potable water usage, based on a five year average that is re-evaluated every 5 years, shall be excluded from this section.

APPENDIX C: SUGGESTED REDLINE RECOMMENDATIONS
OUTDOOR STANDARDS

966	(i)	Outdoor Standard - Alternative Compliance (Same as "Methodologies" Tab Row 3)	<p>(i) Starting in 2035, a supplier meeting all the criteria in paragraphs (1) or (2) may, in calculating its budgets for efficient outdoor residential water use and for commercial, industrial, and institutional landscapes with dedicated irrigation meters, apply the standards described in sections 968(a)(2) and 969(a)(2) through 2040.</p> <p>(2) (A) The urban water use objective calculated by the supplier pursuant to section 966 would result in an objective that is 80 percent or less of the supplier's actual urban water use, calculated in accordance with section 10609.22.</p> <p>(B) The annual reports the supplier has submitted since 2030, pursuant to section 975, show that the supplier is making continued progress, reducing its actual urban water use by an average of no less than 2 percent per year.</p> <p>(C) The supplier verifies compliance with requirements of the G480 Water Conservation and Efficiency Program Operation and Management Standard established by the American Water Works Association.</p> <p>(D) The supplier verifies compliance with the Standards for Tree City USA Recognition.</p> <p>(E) The supplier manages a program dedicated to the creation and maintenance of climate-ready landscapes across its service area. Program elements shall include but are not limited to:</p> <p>(i) The supplier verifies annual conversion of no less than 0.1 percent of turf area into climate-ready landscapes.</p> <p>(ii) The supplier verifies use of a recognized, verifiable rating system, such as the ReScape Rated Landscape Scorecard or the Sustainable SITES Initiative, to assure its program is supporting climate-ready landscapes.</p> <p>(iii) The supplier verifies creation of or participation in regional and local</p>	<p>Our understanding is that this language is intended to serve as an Alternative Compliance Pathway for suppliers with a water use objective that would require a an unreasonable or unattainable reduction in water use and is intended to provide flexibility within the Regulation. This Alternative Compliance Pathway does not provide the necessary flexibility and is problematic as follows:</p> <p>(1) It does not address 2025 and 2030 compliance for suppliers. Some suppliers will be out of compliance with their objective beginning in 2025. This only addresses compliance in 2035.</p> <p>(2) 5 additional years will not resolve compliance for some suppliers. Some suppliers will require a pathway that includes an alternative objective and/or more than additional 5 years.</p> <p>(3) The eligibility requirements for the Alternative Compliance Pathway are cost prohibitive, and would divert suppliers' resources to actions that may not result in compliance -e.g., e.g. SITES rating system is \$9,600 per site to implement.</p> <p>(4) Special districts are ineligible for the Standards for Tree City USA.</p> <p>(5) Requirements to dedicate funding and 40% allocated to DACS conflicts with Proposition 218.</p>	<p>We request to work collaboratively with the State Water Board to develop an "Alternative Compliance Pathway" that provides suppliers with an unreasonable or unattainable objective to be eligible for an alternative objective and/or extension of time to comply. This pathway should balance the goals of achieving meaningful water savings and multi-benefits, while considering cost and affordability.</p>	<p>(i) Starting in 2035, a A supplier may be eligible for an Alternative Compliance Pathway for approval of the Board, that demonstrates a good faith effort toward improving water use efficiency and climate resiliency by meeting all the criteria in paragraphs (1) or (2) may, in calculating its budgets for efficient outdoor residential water use and for commercial, industrial, and institutional landscapes with dedicated irrigation meters, apply the standards described in sections 968(a)(2) and 969(a)(2) through 2040.</p> <p>(1) (A) The average median household income of the supplier's service area is less than or equal to 80 percent of the median household income of California.</p> <p>(B) The urban water use objective calculated by the supplier pursuant to subsection (b) would result in an objective that is 80 percent or less of the supplier's actual urban water use, calculated in accordance with section 10609.22.</p> <p>(C) The annual reports the supplier has submitted since 2030, pursuant to section 975, show that the supplier is making continued progress, reducing its actual urban water use by an average of no less than 2 1.5 percent per year.</p> <p>(D) The supplier shows to the satisfaction of the board that it is unable to meet its urban water use objective because of the applicable outdoor standards identified in sections 968 and 969. The supplier verifies it offers a proactive water use efficiency program that address indoor and outdoor water use, as well as low-income water users.</p> <p>(2) (A) The urban water use objective calculated by the supplier pursuant to section 966 would result in an objective that is 80 percent or less of the supplier's actual urban water use, calculated in accordance with section 10609.22.</p> <p>(B) The annual reports the supplier has submitted since 2030, pursuant to section 975, show that the supplier is making continued progress, reducing its actual urban water use by an average of no less than 2 percent per year.</p> <p>(C) The supplier verifies it offers a proactive water use efficiency program that address indoor and outdoor water use, as well as low-income water users. The supplier verifies compliance with requirements of the G480-Water Conservation and Efficiency Program Operation and Management Standard established by the American Water Works Association.</p>
968	(a)(3)	Outdoor Standard - Timeline	<p>(a)(1) Through June 30, 2030, the standard for efficient residential outdoor use (Soutdoor) shall be a landscape efficiency factor of 0.80.</p> <p>(2) Beginning July 1, 2030, and through June 30, 2035, the standard for efficient residential outdoor use shall be a landscape efficiency factor of 0.63.</p> <p>(3) Beginning July 1, 2035, the standard for efficient residential outdoor use shall be a landscape efficiency factor of 0.55.</p>	<p>The successful achievement of cost-effective multi-benefit landscape transformation programs requires water suppliers to analyze, design, resource and implement cost-effective water use efficiency programs. Additionally, the success of this Regulation requires long-term customer behavior change and significant investments. Educating Californians not only on the value of making these changes but also on the best, cost-effective manner to make these changes, while also supporting and expanding environmental multi-benefits requires time. Due to the delay of the Regulation and change in proposed standards from the Department of Water Resources' recommendations, suppliers and Californians are not being given a reasonable timeline to reduce water outdoor water use, which could result in impacts to shade trees and affordability, and disproportionate impacts to disadvantaged communities.</p>	<p>Modify the proposed timeline for the outdoor standard to provide an additional 5 years for all suppliers to achieve compliance, as follows:</p> <ul style="list-style-type: none"> - 0.8 LEF by 2030 - 0.63 LEF by 2035 - 0.55 LEF by 2040 	<p>(a) (1) Beginning January 1, 2030 and through June 30, 20305, the standard for efficient residential outdoor use (Soutdoor) shall be a landscape efficiency factor of 0.80.</p> <p>(2) Beginning July 1, 20305, and through June 30, 203540, the standard for efficient residential outdoor use shall be a landscape efficiency factor of 0.63.</p> <p>(3) Beginning July 1, 203540, the standard for efficient residential outdoor use shall be a landscape efficiency factor of 0.55.</p>
968	(a)(5)	Outdoor Standard - New Res.	<p>(5) The standard for newly constructed residential landscapes (Snew) shall be the same factor as identified in section 492.4 for residential areas.</p>	<p>Water suppliers need certainty as they implement this Regulation most cost-effectively. MWLEO can be modified absent a regulatory process, which could significantly impact water suppliers overall compliance with the Regulation and associated costs, which would not be captured in the SRIA.</p>	<p>Set the standard for newly constructed residential landscapes at a LEF of 0.55, instead of to MWLEO.</p>	<p>(5) The standard for newly constructed residential landscapes (Snew) shall be the same factor as identified in section 492.4 for residential areas a landscape efficiency factor of 0.55.</p>
968	(b)(2)(B)	Outdoor Standard - INI	<p>(B) Through June 30, 2027, a supplier may include in its residential landscape area up to twenty percent of the supplier's unique square footage of Irrigable Not Irrigated area provided by the Department to the Board on October 3, 2022, if the supplier's actual urban water use for the reporting year, calculated in accordance with section 10609.22, is greater than the urban water use objective calculated pursuant to section 966 without inclusion of Irrigable Not Irrigated area.</p>	<p>DWR conducted a statistical analysis of outdoor water use, LAM and INI data. The data concluded that the INI area is being irrigated at one fifth or 20 percent of the irrigable area. As a result, DWR correctly concluded that the calculation of annual outdoor water use must include 20 percent INI. Additionally, the inclusion of INI is consistent with the 2018 conservation legislation. Water Code §10609.6(a)(2)(B) directed "the standards shall apply to irrigable lands. The removal of DWR's recommended to include 20% for INI is statistically inaccurate.</p>	<p>DWR's findings was based on the recognition that its analysis was only a snapshot in time. It's follow-up analysis indicated that the snapshot missed 20% of the irrigated landscape that was irrigated either before or after the image was taken for the analysis. DWR recognized that this under counting of irrigated area would continue to be the case unless multiple images are conducted over the analysis year. This 20% should not be looked as additional, but as area that is actually being irrigated. Revert to DWR's recommendation with the inclusion of 20 percent INI. Suppliers would recalculate INI when DWR provides new LAM data.</p>	<p>(B) Through June 30, 2027, a A supplier shall include in its residential landscape area up to twenty percent of the supplier's unique square footage of Irrigable Not Irrigated area provided by the Department to the Board on October 3, 2022, if the supplier's actual urban water use for the reporting year, calculated in accordance with section 10609.22, is greater than the urban water use objective calculated pursuant to section 966 without inclusion of Irrigable Not Irrigated area.</p> <p>(1) If the Department provides updated landscape area data, a supplier would recalculate the inclusion of the suppliers' unique square footage of Irrigable Not Irrigated Area of twenty percent.</p>

APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS
OUTDOOR STANDARDS

968	(d)(2)	MWELO	(d)(2) The existence of newly constructed residential landscape area shall be demonstrated by referencing annual reporting required by section 495(b)(6), provided the report has disaggregated newly constructed residential landscapes from the total landscape area reported.	The Regulation would require that suppliers demonstrate the existence of newly constructed residential landscapes through annual MWELO reporting. The majority of new residential landscapes are not subject to MWELO or MWELO reporting. MWELO reporting will be incomplete and will not reflect accurately newly constructed residential landscape area. Gr	Allow for DWR's recommend approach to account for newly constructed residential landscape areas, which included on-the ground measurement, remote sensing methods, and using service area level averages.	(d)(2) The existence of newly constructed residential landscape area shall be demonstrated by using any of the following approaches to quantify irrigable landscapes areas for new landscapes: referencing annual reporting required by section 495(b)(6), provided the report has disaggregated newly constructed residential landscapes from the total landscape area reported. (A) On-the-ground measurement. (B) Using remote sensing methods to quantify irrigable landscape areas. (C) Using service area level averages. In this approach, urban retail water suppliers only need to identify the total number of new developments (Nnd) and average landscape areas for each class at the service area level. The following is an outline of the steps needed to estimate aggregate areas for new landscapes using this approach: (i) Calculate the sum of areas for each of the irrigation status classes delivered by DWR or alternative data source. This involves adding each one of the three classes across all residential parcels in the service area to derive aggregate areas (II-total, INI-total, and NI-total). (ii) Obtain the total number of existing residential parcels (Np) in the service area. (iii) Divide II-total, INI-total, and NI-total by Np to get average II, INI, and NI for the service area (II-avg, INI-avg, NI-avg). (iv) Multiply II-avg, INI-avg, and NI-avg by Nnd. This produces aggregate II, INI, and NI for new developments (II-nd, INI-nd, and NI-nd).
968	(g)(2) (h)(1)	SLA- Pools	(g)(1) An urban retail water supplier may, in calculating its annual urban water use objective, include budgets for temporary provisions for residential outdoor use if the supplier submits supporting information meeting the criteria described in subdivision (i). (2) Temporary provisions may be requested for: (A) water for existing pools, spas, and similar water features (B) water for the planting of new, climate-ready trees (C) water for the establishment of qualifying landscapes (h) Temporary provisions available pursuant to subdivision (g) shall be calculated as follows: (h) Temporary provisions available pursuant to subdivision (g) shall be calculated as follows: (1) A temporary provision for existing pools, spas and similar water features is available beginning January 1, 2035, until January 1, 2040. This provision (Prpool) shall be calculated by multiplying the square footage of existing pools, spas, and similar water features (Apool), by 0.08, by net reference evapotranspiration (Net ETO), and by a unit conversion factor of 0.62.	Residential pools should not be a temporary provisions. The residential factor for residential pools should be same as public pools, which is 1.0. Water evaporates at about 1.0. Not allocating enough water to residential pools effectively further reduces the residential outdoor budget. Most pools are not subject to MWELO, as they are generally in backyards and existing.	Strike language 968(g)(2)(A) and h(1). Add language to 968(c) that residential pools area.	(c)(3) Pools, spas and similar water features shall have a landscape efficiency factor of 1.0. (g)(1) An urban retail water supplier may, in calculating its annual urban water use objective, include budgets for temporary provisions for residential outdoor use if the supplier submits supporting information meeting the criteria described in subdivision (i). (2) Temporary provisions may be requested for: (A) water for existing pools, spas, and similar water features- (B) water for the planting of new, climate-ready trees (C) water for the establishment of qualifying landscapes (h) Temporary provisions available pursuant to subdivision (g) shall be calculated as follows: (h)(1) Temporary provisions available pursuant to subdivision (g) shall be calculated as follows:(1) A temporary provision for existing pools, spas and similar water features is available beginning January 1, 2035, until January 1, 2040. This provision (Prpool) shall be calculated by multiplying the square footage of existing pools, spas, and similar water features (Apool), by 0.08, by net reference evapotranspiration (Net ETO), and by a unit conversion factor of 0.62. This formula is expressed mathematically as follows: $Prpool = Apool \times 0.08 \times Net\ ETO \times 0.62$ The square footage of existing pools, spas, and similar water features (Apool) shall be either (A) the value provided by the Department to the Board on October 3, 2022, or any updates thereafter, or (B) alternative data, if the supplier demonstrates to the Department and Board that the data are equivalent, or superior, in quality and accuracy to the data provided by the Department.
968	(h)(3))b (i)	SLA - Recycled Water	(i) In order to receive approval for either a variance, a temporary provision, or the inclusion of special landscape areas for a given reporting year, an urban retail water supplier must submit to the Board, by no later than October 1, for review and approval by the Executive Director, or the Executive Director's designee, a request that includes the following: (1) Information quantifying and substantiating each request, including showing how it protects beneficial uses of water; demonstrating that the amount of water requested was delivered by the supplier for the requested use; and verifying that the approval of the request would not jeopardize the ability of a permittee within the supplier's service area to comply with existing permit requirements; and (2) A description of efforts to prioritize water for existing trees, including, but not limited to rebate, direct install, and educational programs focused on transitioning from turf- to tree-centric irrigation systems that promote deep and healthy root growth. Tree-centric irrigation systems include but are not limited to soaker hoses, deep drip watering stakes, drip tubing, and emitters. (3) If the request is denied, the volume of water associated with the variance, provision, or special landscape area shall not be included in the objective.	Recycled water should not be a temporary provision. Sites irrigated with recycled water generally do not change and are on DIMs. The requirement to annually apply for a variances and temporary provisions places a significant burden to both State Water Board staff and water suppliers.	Recycled water should not be a temporary provision.	(h)(3)(b)(i) In order to receive approval for either a variance, or a temporary provision, or the inclusion of special landscape areas for a given reporting year, an urban retail water supplier must submit to the Board, by no later than October 1, for review and approval by the Executive Director, or the Executive Director's designee, a request that includes the following: (1) Information quantifying and substantiating each request, including showing how it protects beneficial uses of water; demonstrating that the amount of water requested was delivered by the supplier for the requested use; and verifying that the approval of the request would not jeopardize the ability of a permittee within the supplier's service area to comply with existing permit requirements; and (2) A description of efforts to prioritize water for existing trees, including, but not limited to rebate, direct install, and educational programs focused on transitioning from turf- to tree-centric irrigation systems that promote deep and healthy root growth. Tree-centric irrigation systems include but are not limited to soaker hoses, deep drip watering stakes, drip tubing, and emitters. (3) If the request is denied, the volume of water associated with the variance, or a temporary provision, or the inclusion of special landscape areas shall not be included in the objective.
969	(c)(2)	SLA - Recycled Water	(2) In order to calculate an outdoor budget for CII landscapes with DIMs pursuant to this subdivision, a supplier may include special landscape areas for CII landscapes with DIMs only if the supplier submits supporting information meeting the criteria described in section 968 (i).	Same as above	Same as above.	(c) (2) In order to calculate a residential outdoor budget pursuant to this subdivision, a supplier may include residential special landscape areas only if the supplier submits supporting information meeting the criteria described in subdivision (i).

APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS METHODOLOGIES

Reg. Sec.	Sub. Sec.	Topic	Current Regulatory Text	Concern	Recommendation	Suggested Redline
966	(c)	Methodology - WUE Formula	(c) The objective shall be composed of the sum of the following budgets: (1) A budget for efficient indoor residential water use (Rindoor) as described in section 967. (2) A budget for efficient outdoor residential water use (Routdoor) as described in section 968. (3) A budget for efficient water use on commercial, industrial, and institutional landscapes with dedicated irrigation meters or equivalent technology (CIDIM) as described in section 969. (4) A budget for efficient real water losses (L) as described in section 970. (5) Budgets for any approved variances (V) and temporary provisions (Pr) as described in sections 967, 968, and 969. (6) A bonus incentive for potable reuse (BPR) as described in section 971.	The Regulation should recognize that there are and will continue to be inherent data quality limitations that impact suppliers' compliance with their water use objectives, such as landscape area measurement data, effective precipitation and population data. Currently, the Regulation does not account for data errors and variability. We note that the water loss performance standards do account for data variability.	Include a "Data Error Factor" (DEA) in the formula for calculating suppliers' urban water use objectives. The DEA would be a percentage, of either five or ten percent, applied to a supplier's budget for efficient indoor residential water use, efficient outdoor residential water use and efficient water use on a CI landscapes with a dedicated irrigation meter or equivalent technology, as follows: $WUO = (Rindoor + Routdoor + CIDIM)DEA + L + V + Pr + BPR$ The DEA would recognize suppliers' historic progress and achieved savings (SB X7-7 based) and acknowledge that data used to develop and evaluate standards has intrinsic errors. The magnitude of the DEA would reduce over time as suppliers achieve progress towards their water use objective. We are proposing a five percent DEA for suppliers achieving less than 20 percent reduction from SB X7-7, and a 10 percent DEA for suppliers achieving 20 percent or greater of reduction from SB X7-7.	(c)(7)A Data Error Adjustment (DEA) added to Rindoor, Routdoor, and CIDIM to account for variability in data accuracy. The percentage will be applied based on a comparison with SB X7-7 & targets as follows: (i) TIER 1: Suppliers achieving <= 20% reduction from SB X7-7: +5% of (Indoor + Routdoor + CIDIM budget) (ii) TIER 2: Suppliers achieving > 20% of reduction from SB X7-7: +10% of (Indoor + Routdoor + CIDIM budget)
966	(i)	Methodology - Alternative Compliance	See "Outdoor Standards" Tab Row 3.	See "Outdoor Standard" tab Cell E3.	See "Outdoor Standard" tab Cell F3.	(i) Starting in 2025, a supplier may be eligible for an Alternative Compliance Pathway for approval of the Board, that demonstrates a good faith effort toward improving water use efficiency and climate resiliency by meeting all the criteria in paragraphs (1) or (2) may, in calculating its budgets for efficient outdoor residential water use and for commercial, industrial, and institutional landscapes with dedicated irrigation meters, apply the standards described in sections 968(a)(2) and 969(a)(2) through 2040. (1) (A) The average median household income of the supplier's service area is less than or equal to 80 percent of the median household income of California. (B) The urban water use objective calculated by the supplier pursuant to subsection (b) would result in an objective that is 80 percent or less of the supplier's actual urban water use, calculated in accordance with section 10609.22. (C) The annual reports the supplier has submitted since 2030, pursuant to section 975, show that the supplier is making continued progress, reducing its actual urban water use by an average of no less than 2 1.5 percent per year. (D) The supplier shows to the satisfaction of the board that it is unable to meet its urban water use objective because of the applicable outdoor standards identified in sections 968 and 969. The supplier verifies it offers a proactive water use efficiency program that address indoor and outdoor water use, as well as low-income water users. (2) (A) The urban water use objective calculated by the supplier pursuant to section 966 would result in an objective that is 80 percent or less of the supplier's actual urban water use, calculated in accordance with section 10609.22. (B) The annual reports the supplier has submitted since 2030, pursuant to section 975, show that the supplier is making continued progress, reducing its actual urban water use by an average of no less than 2 percent per year. (C) The supplier verifies it offers a proactive water use efficiency program that address indoor and outdoor water use, as well as low-income water users. The supplier verifies compliance with requirements of the C480 Water Conservation and Efficiency Program Operation and Management.
966	NA	Methodology - Compliance	NA	A supplier may not comply with its water use objective because it is unable to obtain the information required for variances due to resource or other limitations. The State's goal should be for successful compliance with the Regulation. Prior to taking any enforcement action, the State should offer technical assistance to a supplier to determine if the unique water uses in its service area, for which variances are available, would bring the supplier into compliance.	Clarify that if a supplier does not meet its water use objective because it is unable to obtain the information required for the variances, prior to the issuance of any enforcement action, technical assistance must be offered to the supplier.	(j) If a supplier does not comply with section 966(a) because it is unable to obtain the information required in section 967(c) and 968(f) due to resource or other limits, prior to the issuance of any enforcement action, technical assistance must be made available to the supplier.
967	(c)	Variances - Eligibility	(b)(1) An urban retail water supplier may, in calculating its urban water use objective, include budgets for variances identified in paragraph (2) for residential indoor use, if: (A) The supplier submits supporting information meeting the criteria described in subdivision (e); and (B) The associated water use, for any individual variance, represents 5% or more of the sum of the budgets associated with the standards described in section 966 (c)(1) through (4).	The enacted legislation requires the State Water Board to establish appropriate variances for unique uses that can have a material effect on water use of an urban retail water supplier. The regulation currently proposes that an individual variance must represent 5% or more of the sum of a water suppliers budget. This threshold fails to recognize the cumulative impact unique water uses could have on suppliers' ability to comply with their water use objectives. Variances are not a "bonus" or "alternative compliance" mechanism. Variances were intended to account for unique water uses within suppliers' service areas in order to provide an accurate water use objective.	Establish a cumulative threshold for variances of 5%.	(b)(1) An urban retail water supplier may, in calculating its urban water use objective, include budgets for variances identified in paragraph (2) for residential indoor use, if: (A) The supplier submits supporting information meeting the criteria described in subdivision (e); and (B) The associated water use, for the sum of all any individual variances, represents 5% or more of the sum of the budgets associated with the standards described in section 966 (c)(1) through (4).
967	(d)	Variances - Recycled Water	(d) An urban retail water supplier may request a temporary provision to respond to negative impacts to wastewater collection, treatment, and reuse systems, if the supplier shows to the satisfaction of the Board that meeting the objective pursuant to section 966 would require adhering to the applicable residential indoor standard identified in Water Code section 10609.4 and that meeting the budget for efficient residential indoor use is causing challenges within wastewater collection, treatment, and reuse systems.	Recycled water is a permanent and long-term investment. The Governor's signing message for SB 1157 encourage the State Water Board to develop a variance to reflect local investments in recycled water and infrastructure.	Remove "temporary."	(d) An urban retail water supplier may request a temporary provision to respond to negative impacts to wastewater collection, treatment, and reuse systems, if the supplier shows to the satisfaction of the Board that meeting the objective pursuant to section 966 would require adhering to the applicable residential indoor standard identified in Water Code section 10609.4 and that meeting the budget for efficient residential indoor use is causing challenges within wastewater collection, treatment, and reuse systems.

APPENDIX: SUGGESTED REDLINE RECOMMENDATIONS METHODOLOGIES

967	(e)(1)	Variations - Eligibility	(e) In order to receive approval for a variance or a temporary provision for a given reporting year, an urban retail water supplier must submit to the Board, by October 1, for review and approval by the Executive Director, or the Executive Director's designee, a request that includes the following components:	We do not anticipate significant annual variability of water use associated with the variances. Requiring annual submittal and approval of the variances will place significant administrative burden on suppliers that does not achieve actual water savings, as well as the State Water Board.	Allow for variances, once approved, to be valid for five years.	(4) If a variance is approved it will be valid for a minimum of five years unless conditions change significantly. (5) If a variance has not been approved or denied by November 30 after submittal on October 1, the supplier can include the variance in its objective.
968	(e)(1)(B)	Variations - Eligibility	(e)(1) An urban retail water supplier may annually, in calculating its urban water use objective, include budgets for variances for residential outdoor water use if: (A) the supplier submits supporting information meeting the criteria described in subdivision (i); and (B) the associated water use, for any individual variance identified in paragraph (2)(A) through (C), represents 5% or more of the sum of the budgets associated with the standards described in section 966 (c)(1) through (4); or	Same as Cell E4.	Same as Cell F5.	(e)(1) An urban retail water supplier may annually, in calculating its urban water use objective, include budgets for variances for residential outdoor water use if: 13 (A) the supplier submits supporting information meeting the criteria described in subdivision (i); and (B) the associated water use, for the sum of all any individual variances identified in paragraph (2)(A) through (C), represents 5% or more of the sum of the budgets associated with the standards described in section 966 (c)(1) through (4); or
968	(h)(3)(B)(i)	Variations - Eligibility	(i) In order to receive approval for either a variance, a temporary provision, or the inclusion of special landscape areas for a given reporting year, an urban retail water supplier must submit to the Board, by no later than October 1, for review and approval by the Executive Director, or the Executive Director's designee, a request that includes the following:	Same as Cell E6	Same as cell F5	(i) In order to receive approval for either a variance, a temporary provision, or the inclusion of special landscape areas for a given reporting year, an urban retail water supplier must submit to the Board, by no later than October 1, for review and approval by the Executive Director, or the Executive Director's designee, a request that includes the following: (1) Information
975	(a)	Reporting - Fiscal Year	(a) Each urban retail water supplier shall submit to the Board, no later than January 1, 2024, and by January 1 every year thereafter, the report required by Water Code section 10609.24. The report shall reflect the conditions of the previous state fiscal year.	Water Code Section 10609.20 (b) states the objective calculation "shall be based on the urban retail water supplier's water use conditions for the previous calendar or fiscal year." However, the Regulation limits flexibility and would require suppliers report the conditions of the previous state fiscal year. It is unclear the benefit of requiring all suppliers to report on a fiscal year. Suppliers should be provided the discretion to report most accurately and cost-effectively to the State, based on available data. This would be consistent with water loss reporting which also provides suppliers discretion to report on either a fiscal or calendar year.	Provide flexibility for water suppliers to either report on a state fiscal year or calendar year, consistent with the water code.	(a) Each urban retail water supplier shall submit to the Board, no later than January 1, 2024, and by January 1 every year thereafter, the report required by Water Code section 10609.24. The report shall reflect the conditions of either the previous state fiscal year or calendar year.