



COACHELLA VALLEY WATER DISTRICT

Established in 1918 as a public agency

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August 19, 2021

Water Use Efficiency Branch
Department of Water Resources
P.O. Box 942836
1416 9th St, Sacramento, CA 95814

Subject: Provisional Outdoor Standard

Dear Water Use Efficiency Branch,

The Coachella Valley Water District (CVWD) welcomes the opportunity to provide comments to the California Department of Water Resources (DWR) on the *provisional outdoor standard presented at the June 30 Standards and Methodologies workshop*. CVWD serves approximately 300,000 residents in its 1,000 square-miles of service area ranging from the San Geronio Pass to the Salton Sea, mostly within the Coachella Valley area of Riverside County, including small areas within Imperial and San Diego counties.

Additionally, CVWD has signed onto a letter by the Association of California Water Agencies (ACWA), and is in support of their larger set of comments.

CVWD recognizes that DWR, in coordination with the State Water Resources Control Board (State Water Board), has a statutory requirement to conduct necessary studies and investigations, and recommend no later than October 1, 2021, a standard for outdoor residential and dedicated irrigation meters. However, we have significant concerns regarding DWR's approach to develop a provisional outdoor standard.

CVWD respectfully submits the following comments on DWR's provisional standards:

- CVWD found significant errors in the Landscape Area Measurement data received by DWR, as well as approximately 3,600 parcels missing due mostly to landscape use codes errors. CVWD has concerns about the level and quality of the data due to classification errors during the initial aerial interpretation process. CVWD has general concerns about smaller agencies who do not have the same resources as CVWD in evaluating the data received from DWR, and potential omissions in data not being identified.

- CVWD is encouraged by discussions that agencies will be able to utilize their respective landscape area data that aligns with their billing data. However, clarity is requested as to the parameters of the process, and a projected timeline for submission.
- The enabling legislation (AB 1668) states that “The standards shall apply to irrigable lands” (10609.6). This provision reflects the fact that landscapes can change over time, and that areas not currently irrigated can become irrigated. To be consistent with the legislation, CVWD recommends that the outdoor standard be based on an ET factor of 1.0 for irrigable irrigated (II) landscapes and a lower ET factor of 0.55 for all (100%) irrigable not irrigated (INI) areas irrigated with potable water, without limitation.

Sincerely,



Katie Evans
Director of Communications and Conservation

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File: 1150.112