



CUWA Policy Principles

Implementation of Long-Term Urban Water Use Efficiency Requirements

September 19, 2019

Water use efficiency (WUE) is foundational to CUWA's mission and critical to our agencies' water supply reliability. Recently enacted legislation outlines goals for urban water agencies to use water more wisely, reduce water waste, and strengthen local drought resilience. CUWA has established the following principles as guideposts to promote consistent and effective implementation of long-term urban WUE policies, including requirements set by AB 1668 and SB 606, as part of a broader portfolio of strategies to bolster resilience.

1. State and local agencies must collaborate to successfully implement shared WUE goals.

CUWA supports the State's interest in advancing WUE, as laid out in the Primer of 2018 Legislation on Water Conservation and Drought Planning, and CUWA recognizes the complementary roles played by the Department of Water Resources (DWR), State Water Resources Control Board (State Board), urban water suppliers, and other entities. CUWA appreciates the engagement of stakeholders and encourages the State to defer to local agencies when possible and fully leverage advantages of locally-tailored efforts (e.g., water shortage contingency plans) to achieve statewide goals. Given that urban water use is on the order of 10% of the state's collective water demand¹, the broader context of agricultural and environmental needs must be considered for shared outcomes.

2. Multiple strategies, including WUE, are needed to build long-term resilience and sustainably manage water resources.

While urban WUE is an important aspect of water resources management, it cannot alone accommodate future population growth and reliability of all urban water suppliers, particularly amid mounting and intensifying climate variabilities. Increasing flexibility through more diverse supply and storage options and engaging integrated regional water management regions will better position urban utilities, DWR, and the State Board to address future uncertainties. As directed in Governor Newsom's Executive Order N-10-19 and the California Water Plan Update 2018, future investments should prioritize multi-benefit projects, innovation, and regional approaches.

3. While continued focus on indoor water use efficiency will have diminishing returns, significant potential remains for reductions in outdoor water use.

California has made great progress in indoor water use efficiency. Many utilities are reaching a tipping point of indoor efficiency where further reductions not only yield diminishing returns but can also result in adverse impacts, triggering unintended consequences on water, wastewater, and recycled water systems.² Conversely, there is room for substantial progress in outdoor water use efficiency, which has less of an impact on conveyance and treatment systems. Similar to the plumbing industry's role in helping communities reduce water use indoors through more efficient

¹ Department of Water Resources, 2019. [California Water Plan Update 2018](#).

² CUWA, 2017. [Adapting to Change: Utility Systems and Declining Flows](#).

water fixtures, land use agencies and landscape professionals are key partners in setting new expectations for outdoor water use. CUWA agencies have had great success through landscape transformation programs that encourage “California-friendly” vegetation.

4. To achieve sustainable efficiencies, CUWA encourages the State to fully study implications of indoor water use standards to California utilities and take an iterative, adaptive approach.

As water use regulations take effect, utilities statewide will experience changes to system flows. While the full extent of implications to utility systems, investments, and decisions is not yet known, recent legislation requires the State to conduct “studies and investigations” before recommending standards for indoor and outdoor water use. Since many consequences of reduced flow are exacerbated by other factors (e.g., water quality and pipe slope), and some impacts (e.g., corrosion) may take years to manifest, these studies should involve a representative sample of utility data to understand impacts over time. When considering the potential reduction of the indoor water use standard from 55 gallons per capita per day (gpcd) to as low as 50 gpcd, managing inherent risks is particularly important and best supported through iterative and adaptive approaches.

5. Technical assistance and funding support are needed from state agencies to comply with long-term urban WUE requirements.

To comply with complex annual reporting requirements (e.g., calculating standards and performance measures), the State will need to provide significant technical assistance and funding support, particularly for smaller and disadvantaged utilities with limited technical, managerial, and financial capacity. For example, calculating outdoor water use standards involves measuring landscape areas, determining irrigable areas, and determining evapotranspiration, which requires aerial imagery, parcel information, locally available and maintained CIMIS stations, and ground-truthing.

6. Water loss control is an important component of WUE, and volumetric standards will be most effective if vetted through an iterative and collaborative stakeholder process prior to adoption.

CUWA agencies and others have actively been taking steps to reduce water loss, through focused efforts and leveraging new technology and innovation in leak detection and mitigation. Performance standards for water loss are a relatively new concept for the industry and will be most meaningful if informed by an iterative process that engages water suppliers, water loss experts, and peer reviewers to validate data, assumptions, and applicability.

7. CUWA agencies remain committed to further supporting WUE through the following approaches.

- Playing a leadership role with other utility organizations, land use agencies, public stakeholders, and state and federal agencies to form partnerships and further progress WUE programs, sharing tools and/or approaches that could be replicated by others.
- Promoting continued progress toward California-friendly landscape and outdoor WUE, where significant potential remains.
- Supporting customer education and outreach to encourage and maintain customer behavioral changes.
- Pursuing innovative and cost-effective technologies, best practices, and programs that improve WUE and ease adaptations to new (and lower) flow expectations.
- Working with the State to advance applied research and implement new and emerging technologies, including predictive analytical tools and leak detection technologies, to better inform sustainable water management and WUE.
- Promoting efficient and effective reporting of water data to state agencies and leveraging existing data portals as guided by AB 1755.