

UWUO Legislative Clean-up

1. CA DWR to provide Urban Retail Water Suppliers with regular, periodic updates of both Residential and CII landscape area data as a geodatabase (Every 5 years, 2 years prior to each UWMP submittal deadline)
 - a. Statewide development and delivery of Service Area wide landscape area measurement on a regular basis would allow suppliers and the State to have a standardized data set to measure progress of implementation and comparison. The resulting landscape area geodatabase would be inclusive of all landscapes considered by the regulation such as tree canopy, qualifying landscapes, etc.
2. Classify parkway landscape areas according to adjacent land use type (Residential or CII).
 - a. Many parkways are irrigated by residential irrigation systems that go under the sidewalk and into the parkway, however the SWRCB has only included the residential parcel up to the sidewalk as residential landscape area as part of the urban water use objective budget. Allowing suppliers flexibility to classify those areas as either residential or CII based upon the specific area would allow for better representative budgets for specific use/setup.
3. Remove non-potable deliveries and non-potable objective budgets from the regulations
 - a. Early adopters, both suppliers and customers, of non-potable demands consider recycled water one of the highest tiers of potable water conservation. Inclusion of non-potable demand management, BMP implementation, etc. within the Water Conservation Framework undermines the overall conservation efforts and progress made.
4. CA DWR to provide Urban Retail Water Suppliers with regular, periodic climatological data required to estimate the Residential and CII DIM outdoor budgets (quarterly or semi-annually) and streamline the CIMIS station installation and deployment.
 - a. Higher frequency of climatological data would allow suppliers to manage demands in a timely manner and determine regulatory compliance ahead of annual reporting. Moreover, additional stations would provide higher resolution for more accurate data.
5. Further define or clarify vague language to facilitate Supplier implementation of the Conservation Framework.
 - a. Irrigable, Irrigated area
 - i. "Irrigable, Irrigated Area" is comprised of residential area of healthy vegetation, where the vegetation appears to be in growth, not senesced, and is foliated,

along with any residential area that is currently not being irrigated or may be irrigated in the future, according to URWS's customer irrigation policies.

- b. CII categories
 - i. 972(b) In addition to ENERGYSTAR Portfolio Manager's Broad Categories, each supplier shall identify every CII water user associated with:
 - (1) CII laundries
 - (2) Car Wash
 - (3) Water Recreation
 - (4) Landscapes with dedicated irrigation meters. For every CII water user associated with a landscape, the supplier shall also identify the water user's ENERGY STAR Portfolio Manager Broad Category
 - c. Conservation Programs
 - i. "the collective efforts and programming of an Urban Retail Water Supplier to promote or increase water use efficiency for customers that consist of at least four of the five Best Management Practices, as identified in Section 974(f)"
 - d. Operational Best Management Practices
 - i. 974(f)(5) Operational best management practices.
 - (A) Proactive infrastructure operational changes & maintenance (for example, meter replacement programs, meter calibration programs, customer side leak detection)
 - (B) Billing or data collection procedures (for example, data tracking, analysis, and reporting improvements)
 - (C) Municipal ordinances or water supplier policies that encourage or require efficient water use
 - (D) Dedicated water conservation enforcement staff
 - (E) Other operational best management practices to facilitate CII best management practices program implementation and evaluation
 - (D) Other CII best management practices derived from additional innovation and technology advancement that can be taken by suppliers, subject to Board approval
6. CA DWR to modify MWELO Reporting for land use agencies to provide URWSs new development landscape area for residential and CII-DIM objectives.
- a. Currently MWELO aggregates all new landscapes without differentiating by sector. Updating DWR's reporting mechanisms allows for better coordination and accounting of URWS's landscape area

7. Update to enforcement dates based on actual date of regulation adoption. Allow for fiscal year and calendar year reporting to mirror water loss reporting.
8. Add in coverage for CalWEP's programs along with regional