August 1, 2012

Hon. Lee Leffingwell, Mayor,
Hon. Sheryl Cole, Mayor Pro Tern, and
Members of Council
City of Austin

RE: August 2, 2012 Agenda Items 10, 11, and 12 – Drought Contingency Plan and Related Water Management Rules

Dear Mayor Leffingwell, Mayor Pro Tem Cole, and Councillors:

This Thursday you are scheduled to vote on revised drought and conservation rules (Items 10, 11, and 12). After reviewing the drafts submitted by staff, we are asking that you amend these documents to make them more effective in conserving water and more informative and useful to Austin Water Utility customers and the general public.

1. In the Water Conservation Plan for Wholesale Customers, page 9, the Council-approved goal of 140 gallons per capita per day (gpcd) by 2020 is not reached even in 2023. We do not understand why AWU staff would propose a plan that does not comply with the Council-approved goal for 2020. AWU staff should be encouraged to meet the 140 gpcd goal sooner than 2020, rather than ignore official Council policy.

In order to reach this reasonable and readily achievable goal, the Council should, during the budget process, restore adequate funding to water conservation and direct AWU staff to spend the water conservation funds that are budgeted.

2. Regarding the Drought Contingency Plan, page 5, we agree that Stage I should be raised to the 1.4 million acre feet (MAF) level of storage trigger. Similarly, we urge that the Stage II trigger be raised from 900,000 AF to 1 million AF, and that Stage II not be lifted until we obtain 1.1 MAF of storage (consistent with the recent request from LCRA that firm water customers not lift drought restrictions until the lakes Travis and Buchanan reach the 1.1 MAF combined storage level).

Similarly, we believe the 600,000 acre-foot Stage 3 drought trigger is too low and should also be raised. The drought of record, on which this trigger is based, ended in 1957, when Austin had less than 212,000 people. Today we have over 790,000, with over 900,000 on the Austin Water Utility system. To adequately protect the public from potential shortages, we need a larger margin of safety and recommend that Stage 3 restrictions be triggered at 700,000 acre-feet and not be lifted until we obtain at least 800,000 AF of storage.

3. Regarding the revised water conservation code, page 7, we feel that the mandated inspections of irrigation systems for large landscapes should include recommendations to save water as well as a verification of minimum compliance of the system. The inspection process should include a conservation component that helps achieve overall city conservation goals, utilizing the expertise already assigned to the site to, at minimum, recommend improvements that will reduce water use and save the commercial and multi-family customer money on their water bills.
3.B. We also believe that the top 10% of commercial customers should have their irrigation systems inspected annually, rather than once every several years. (Though the time period is not specified in these conservation code revisions, the original idea for these irrigation inspections in the 2007 Water Conservation Task Force was every 3 years.) Greater area and operating time from these very large commercial customers often guarantees more strain on irrigation systems and more likelihood of leaks and maintenance problems.

3.C Table 2, page 5, of the draft Drought Contingency Plan should identify the primary Stage 1, Stage 2, and Stage 3 watering restrictions (2 days per week, 1 day per week, and no outdoor watering, respectively) so that the plan is clear and serves the critical educational purpose of familiarizing both residents and businesses of the key components of each drought stage.

Thank you for your consideration.

David Foster
Clean Water Action

Paul Robbins
Citizen Activist

Roy Waley,
Austin Group, Sierra Club

Jennifer Walker
Lone Star Chapter, Sierra Club

Bill Bunch
Save Our Springs Alliance
## Austin Water Utility

### Water Conservation Analysis

**FY2008-FY2012**

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AUSTIN WATER CONSERVATION BUDGET

$10,000,000
$8,000,000
$6,000,000
$4,000,000
$2,000,000
$0

2008 2009 2010 2011 2012 YTD

□ BUDGETED □ SPENT
Five-Year Water Conservation Budget Commitment vs. Spending

2007-2012

■ BUDGETED □ SPENT