

## Public Comments on Proposed Changes to Watering Rules and the 2024 Water Conservation Plan

San Antonio Water System received more than 1,45 survey responses and emails on the proposed changes to the watering rules and draft Water Conservation Plan. We have summarized some of the most frequent topics and important changes that were made to address those concerns.

\*Note: Many survey responses/emails included multiple topics.

Comment	<i>*Number of comments</i>	Additional Information Provided	Responsive Changes Made
Drip Irrigation	148		
<ul style="list-style-type: none"> <li>• Many opposed to the proposed one day a week watering</li> <li>• Comments stated they invested in drip irrigation as it is more efficient</li> <li>• Stated need to maintain investment in landscape and trees</li> <li>• Particular concern about residential vegetable gardens and interest in special variance for drip in this context</li> <li>• Doubts that drip irrigation really uses as much water as spray irrigation; requests for data</li> <li>• Concerns that SAWS and irrigators had supported their investments in drip irrigation</li> <li>• Calls for more education on appropriate use of drip irrigation</li> </ul>	113	<p>Drip irrigation has grown in popularity in recent years in large part because current watering rules allow it to be used eight hours a day, every day. It is a big misunderstanding that drip de facto uses very little water. Drip is often sold on the basis that it is efficient, which can be true but is not an absolute. Drip can apply water directly to the roots right where plants need it, resulting in less evaporation. But if it's designed or maintained poorly — particularly when it is set to run more often than necessary — it can be much less efficient than traditional irrigation methods. In fact, the application rate from drip irrigation can be on par with that of spray irrigation. We often see homes and businesses with drip using very large amounts of water during drought because it is often perceived as using very little water. In some cases, drip is seen and used as a “loophole” in the drought watering rules. This needs to change so that drip</p>	<p>The original proposal would have moved the operation of drip irrigation to the same schedule as spray irrigation systems. Updates were made to the proposed changes after community feedback was received. Now the proposal is to move drip irrigation operation to a reduced number of days per week depending on the stage of drought, and always during watering hours.</p>

		<p>is used appropriately to maintain plants and not as a mechanism to use more water.</p> <p>Does drip need longer hours? No. It is one of the misunderstandings about drip irrigation. Typical drip installations apply water at the same rate as spray irrigation. With either spray or drip, it is important to know the application rate to set the timing appropriately. Because many people believe drip should run for hours, they often use excessive water operating it more than twice as much as is logical.</p>	
Drip Irrigation for Vegetable Gardens	35	Irrigating efficiently can minimize water waste, prevent runoff and produce a better crop.	The proposed rule changes allow additional use of drip for gardens meeting the definition of vegetable gardens. The proposed changes continue to define vegetable gardens as “any noncommercial vegetable garden planted primarily for household use; “non-commercial” includes incidental direct selling of produce from such a vegetable garden to the public.”
Changes to the Watering Hours	81		
<ul style="list-style-type: none"> <li>The current and/or proposed watering times do not fit the customer’s schedule.</li> </ul>	81	Under the current Year-Round and Stage 1 rules, our community’s watering hours are before 11 a.m. and after 7 p.m. In Stage 2, the current watering hours are 7-11 a.m. and 7-11 p.m. According to ERCOT, there are challenges with	Customers using hose-end sprinklers can apply for a variance to water 7-10 p.m.

<ul style="list-style-type: none"> <li>• The proposed times are too dark for customers who water with a hose-end sprinkler.</li> <li>• Variances in the watering time are needed so that customers watering with hose-end sprinklers won't have to risk injury by irrigating in the dark.</li> <li>• 7-11 a.m. is too late in the day to start watering.</li> <li>• 5-7 a.m. and 9-11 p.m. are too dark and difficult for elderly/disabled customers.</li> <li>• It's unfair that customers who water with hoses are allowed to water everyday while those with sprinkler irrigation are limited to once per week.</li> </ul>		<p>high demand of the energy grid from 7-9 p.m. during the summer. SAWS uses more energy during this time as many people start watering their landscapes and high-service pumps are turned on to refill our elevated tanks and maintain pressure. The new proposed hours would be before 10 a.m. and after 9 p.m. under Year-Round and Stage 1 watering rules, and 5-10 a.m. and 9 p.m. to midnight in Stage 2.</p>	
<p><b>Enforcement – Access to Premises</b></p>	<p>2</p>		
<p>Concern over how access to premises may be interpreted</p>	<p>Two emailed comments; concerns also raised during stakeholder meetings and public presentations.</p>	<p>Some gated communities denied SAWS patrol staff entry for purposes of enforcing drought rules. In order to enforce rules equally across the service area, SAWS needs to enter all neighbors where service is provided. This is much the same as SAWS needing to enter neighborhoods to read meters or make repairs.</p>	<p>The proposed language was clarified to make clear that gated communities cannot prevent SAWS personnel from entering for purposes of drought rule enforcement, but that SAWS personnel will not enter homes.</p>
<p><b>Irrigation System Plan Review</b></p>	<p>16</p>		
<p>Plan review and inspections for new irrigation systems too rushed</p>	<p>16 written comments; also frequently</p>	<p>Irrigation system plan review is an important step in ensuring that irrigation systems are well designed. Plan review and operational inspections for new residential irrigation and all</p>	<p>To help stakeholders be successful in the new plan review and inspection process, the timeline to</p>

	raised during stakeholder meetings and industry group presentations.	irrigation outside of the extraterritorial jurisdiction were proposed to begin in the last quarter of 2024.	implement these news steps was pushed back. Plan Review will begin in January of 2025 and Inspections will begin in January of 2026. The time in between will be spent helping stakeholders understand the new process.
Charge on the bill for violations	<i>68 total</i>		
<ul style="list-style-type: none"> <li>• Questions about due process related to the appeals process for watering violations</li> <li>• The fee structure</li> <li>• Whether citizens in the CoSA ETJ should be subject to CoSA decisions</li> <li>• Some comments stated a preference for the opportunity to appear before a judge in the case of a watering violation</li> </ul>	68	It is always important that there be an opportunity to question a violation to prevent errors. In this proposal, customers may dispute a fee on their bill directly with SAWS rather than going through a lengthy court process. SAWS will be able to provide photographs and notes to concerned customers to ensure there was no error. Customers who do not find the evidence compelling will have an opportunity to dispute their violation through a formal appeals process.	The dispute resolution process was changed so that customers dissatisfied with resolutions provided by SAWS employees can request their alleged violation be reviewed by members of an impartial dispute resolution committee comprised of non-SAWS employees.

Other questions and comments submitted did not result in changes to the proposal but did appear frequently enough that providing additional information was warranted. Those items follow in the table below:

Comment	<i>*Number of comments</i>	Additional Information Provided
Stage 3 High Use Surcharge	<i>237 total</i>	
<ul style="list-style-type: none"> <li>• Concerns about the surcharge threshold (95 comments)</li> <li>• Concerns about fees in general, Uplift fees (30 comments)</li> <li>• Billing errors and meter misreads by SAWS (20 comments)</li> </ul>	<i>149</i>	<p>Most customers will not be impacted by the surcharge since it is designed to impact the top 5% of water use accounts. The thresholds at which the surcharge may be applied were developed by analyzing actual 2022 and 2023 billed use by meter size and customer class. The surcharge will encourage more careful use of discretionary water. On a case-by-case basis, SAWS may work with customers to resolve surcharge application on accounts that experienced and repaired leaks. In addition, commercial customers for whom water use is core to business function (plant nurseries, city parks, etc.) may not be subject to the surcharge. Uplift customers are exempt as they typically do not achieve the threshold volumes, however Uplift accounts that meet a threshold in advanced drought are referred to other SAWS programs such as Plumbers to People in order to lower water use.</p>
<ul style="list-style-type: none"> <li>• Large lots</li> <li>• Landscapes and trees' benefits to community</li> </ul>	<i>87</i>	<p>Lot size is not very predictive of water use. There are small lots where water use is very high, and large lots where usage is modest. Outdoor water usage is very much based on personal preference; many people water to maintain a very green lawn while others allow their grass to be dormant in the summer. Many landscapes have drought-tolerant plants that require less water. Homeowners may also be able to identify areas that are not as high profile where they could water less frequently during a drought. We recommend you schedule an Irrigation Consultation with our licensed irrigators for help with your watering schedule. Low-water-use plant selections can be found on <a href="http://GardenStyleSA.com">GardenStyleSA.com</a>.</p>
Pools	<i>54</i>	<p>Uncovered pools often lose one to two inches of water per week to evaporation in the summer. This is typically around 500-750 gallons of water for an average pool although it depends on pool size and airflow. In comparison, an average irrigation system uses 2,000 gallons each time it runs. Draining and refilling a pool could use more than 20,000 gallons and should be avoided during severe droughts, if possible.</p>

Large families	68	There have been studies on indoor water usage for family size. Even a home with 10 adults and 10 children would still not reach 20,000 of indoor water consumption in a month. This level of usage is almost always reflecting discretionary uses of water.
Leaks	28	Leaks could be reported to SAWS to prevent a surcharge. There is an existing leak adjustment policy where households can provide information to SAWS to request a bill credit. More information is available at <a href="http://saws.org/leakadjust">saws.org/leakadjust</a> . Additionally, in a few short years all households will have the benefit of a ConnectH2O meter that can document how much water went to a leak, as well as notify a customer early on when a leak begins.
<ul style="list-style-type: none"> <li>• More drought-tolerant landscaping and more efficient irrigation should be required by the city and SAWS for new residential and commercial construction.</li> <li>• Existing homeowners are being asked to use less water while newly constructed homes are allowed variances for high water use.</li> <li>• Lawns and irrigation should not be allowed in new construction / “no more than 50% of the lot, minus the home's footprint, should be lawn.”</li> <li>• Concerns that HOAs continue to require too much grass in subdivisions and medians, and do not permit xeriscape or artificial turf.</li> </ul>	81	<p>According to <a href="#">State of Texas per State Bill 198</a>, an HOA cannot prohibit or restrict a property owner from using drought resistant landscaping or water-conserving turf.</p> <p><a href="#">San Antonio city ordinance</a> states that an HOA cannot require you to plant, replace or water your brown grass with thirsty new sod.</p> <p>Since 2006, homebuilders and developers have been required to offer a drought-tolerant landscape option or install an approved drought-tolerant turfgrass.</p> <p>SAWS has made outreach efforts and is actively working to communicate to HOAs that they may not require installation of grass and watering it in excess to keep it green.</p>

Commercial users	<i>80 total</i>	
<ul style="list-style-type: none"> <li>• Large commercial users are watering every day and allowing water to run off their landscapes onto the streets.</li> <li>• Comments stated they believe commercial properties are not being enforced on equally.</li> <li>• Customers reported the same location multiple times for water waste, and stated nothing changed. They commented commercial irrigators should have play by the same rules and pay more for their water.</li> <li>• Concerns about high water use at golf courses, shopping centers and tourist attractions.</li> <li>• Concerns that SAWS “penalizes” residential customers with higher rates while catering to commercial customers, builders and developers with lower rates and fewer rules.</li> </ul>	80	<p>Seven percent of accounts are commercial accounts. These violations may be more easily observed as the properties are typically in highly visible locations. Irrigation-only commercial accounts with multiple citations may be subject to shut-off until violations are resolved.</p> <p>Approximately 4,000 commercial accounts are required to complete the Annual Irrigation Checkup to ensure systems are in good working order with no water waste. If the checkup is not completed by the May 1<sup>st</sup> deadline, there is a failure to comply fee and an additional monthly volumetric rate on irrigation consumption until the account is in compliance. Commercial rebates are available to assist properties with their conservation efforts. Commercial rebates are available to assist properties with their conservation efforts.</p> <p>All commercial water that is billed as irrigation would be subject to the Stage 3 surcharges. Water at businesses that is for indoor uses is billed differently and would not be subject to the surcharge. SAWS commercial accounts often have dedicated irrigation meters separate from indoor ones to easily facilitate this process.</p> <p>SAWS’ rate structure does not benefit one customer class over another; the only accommodation made to a customer specifically based on classification is the benefit of the SAWS Uplift program which is funded through the Affordability Rate.</p>
Growth in San Antonio area and whether growth should be limited by water supply	<i>71 total</i>	
<ul style="list-style-type: none"> <li>• Concerns that allowing water for new development effectively discriminate against existing residents and older homeowners in favor of new construction, new residents and younger users/ apartment dwellers</li> </ul>	71	<p>In 2023 commercial accounts were billed for 22% of consumed water and apartments were billed for 16%. Single-family residences accounted for 56% of billed use. Although some non-residential customers may be big users, most of the community’s water is attributable to single-famly residences.</p> <p>Pursuant to 30 T.A.C. 24. all water utilities in the State of Texas are obligated by law to provide service within their certificated areas. This means that SAWS</p>

<ul style="list-style-type: none"> <li>• Large high-density apartment complexes viewed as high water users</li> <li>• Calls to stop issuing building permits in areas without adequate water or infrastructure</li> <li>• Calls for additional water supplies</li> </ul>		<p>has an obligation to provide service to customers who request it, whether new or existing, if they are requesting service at a location within SAWS' certificated service area. However, SAWS is aware of the community's growth and is working to continue diversifying and expanding supplies. Later this summer SAWS will release its updated Water Management Plan which elaborates on how existing water resources are managed and plans for future supplies. As well, SAWS is paying close attention to water availability and how much water can be offered to new development in the community.</p>
<p>Constructive feedback (various topics)</p>	<p>80 total</p>	
<ul style="list-style-type: none"> <li>• Transparency</li> <li>• Community engagement</li> <li>• Importance of education and communication</li> <li>• Rebates to help reduce water use</li> <li>• High temperatures affect water use</li> <li>• Only allow lawn in either the front yard or backyard</li> <li>• Some people willing to pay more for water</li> <li>• Stronger rules</li> <li>• Accounting for climate change</li> </ul>		<p>SAWS received additional constructive feedback and ideas from the community. While not incorporated in this 2024 Water Conservation Plan, they are useful considerations for future plans and programs, helping SAWS be prepared for the future and increase community engagement.</p>