

May 14, 2014

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: Oppose Regulation Concerning Filling Swimming Pools and Spas

To Whom It May Concern:

I am writing to strongly oppose recent proposals to ban the filling of new and remodeled pools. As a small business owner, these regulations threaten to put our company and others like us out of business and will do little to save water in our region.

In fact, this regulation is purely symbolic. If you look at the numbers, replacing a grass lawn with a pool will save a homeowner more than 10,000 gallons of water in that first year. Once a pool is constructed, it takes very little water to maintain. In fact, a well-maintained pool only needs about 14,000 gallons of water each year and far less if the pool is covered. When you compare that with the 44,000 gallons needed to maintain a lawn, you can see just how much water pools and spas save. If pools can't be filled or fixed this year, next year's potential water savings will be minimal.

Pool owners are part of the drought solution, and have been for decades. Each year, a single pool owner saves our region more than 40,000 gallons of water. That's enough water to fill at least two new or remodeled pools *every year*. And since pool builders and pool owners have saved the region so much water, it is unfair and draconian to single them out during this drought.

If a resident's lawn dies, do they have the right to replace it? Lawns are much more water dependent than pools, yet pool owners who have made an investment to improve their water usage are singled out and penalized.

Only time will tell what future rainfall totals will be and the impact to the district's water supply will only magnify each year. Water Districts should be focused on creating policies that will actually make a difference and not just arbitrarily going after pool builders and homeowners because they are easy targets.

As an example, consider that the projected total water use for the greater Santa Clara Valley that surrounds San Jose is approximately 362,000 acre/feet of water. That equates to more than 118 billion gallons of water. The projected number of new construction and remodeled pools for 2014 is approximately 840. If the average pool contains approximately 20,000 gallons of water, the total projected water use by the swimming pool industry is approximately 16,800,000

gallons of water. This amounts to .00014 percent of the total water consumption or the equivalent of 4 drops of water in a five gallon bucket.

Now consider the economic impact. The swimming pool industry in the SF Bay Area employs thousands of people and generates more than \$50 million dollars in economic stimulus. This money trickles down to things like millions of dollars in permit fees and jobs and payroll taxes not to mention the improvement in property values and the associated taxes. The economic impact of such a decision is SIGNIFICANT!

This concept is perhaps most easily grasped when you look at the dollars of Gross State Product that various economic sectors produce per acre/foot of water. There is not a single industry in the state that makes a more productive use of an acre/foot of water than the swimming pool industry.

<u>Economic Sector</u>	<u>Dollars (GSP2001) per Acre-Foot</u>
Rice	58
Alfalfa	65
Cotton	252
Total Agriculture:	893
Orchards	927
Vineyard	1,510
Fruits/Veggies	3,585
Schools	36,378
Food Processing	88,784
Paper and Mills	124,045
Petroleum Refining	162,274
Total Commercial:	547,153
Total Industrial	574,923
High Technology	949,614
Swimming Pool Industry	1,009,700

One more thing to consider – the water that is used to fill a swimming pool is not wasted, it is simply contained. It is being used for recreation, exercise and therapy. This water is still there regardless of how long the drought continues. It is sanitized (it can easily be made potable) and ready for emergency use should the need arise.

Pools and spas are not part of the problem; they are part of the solution.

But there is always more everyone can do, including our industry. That's why we're working with the California Pool and Spa Association on a statewide education campaign. They are providing bill inserts, door hangers and displaying posters with tips for pool and spa owners. An interactive website, www.letspooltogether.com, has been launched that provides tips on saving water

in and outside the house and the industry has partnered with the Association of California Water Agencies to complement the Save Our Water campaign.

Incidentally, the swimming pool industry is already undergoing involuntary, self-regulating water rationing by virtue of the publicity surrounding the drought. Requests for proposals are off by 30 to 40 percent so this is a clear indication that the public is listening. As an industry, we accept this as an inherent consequence of the current drought condition. We ask only that a measured, thought out approach be considered.

I understand that this drought is unprecedented, but this regulation is not the answer.

Sincerely,

Marc Hannigan
Vice President
Adams Pool Solutions