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California Building  
Industry Association

National Association  
of Home Builders

March 4, 2010

Honorable Ben Hueso  
Council President  
City of San Diego  
202 C Street  
San Diego, CA 92101

Re: Agenda Item 335, Water Submetering Ordinance: Conditional Support

Dear Councilmember Hueso,

The Building Industry Association of San Diego County is comprised of 800 member companies representing a work force of nearly 65,000 men and women. As the state's largest single-region BIA chapter representing 90 percent of San Diego builders, we are proud of our 70-year history as the voice of the local regulated community.

The BIA has worked closely with the city and county water agencies to provide input on several water policy issues including the model landscaping ordinance and the city's emergency drought ordinance. We certainly agree with the city that water availability is a critical issue for the region.

With this in mind, we offer our support for the submetering ordinance provided the city will address the following issues that are a concern to the BIA:

**Water Capacity Fees And Water Data Cards**

Capacity Fee charges for new development must be reduced to reflect the significant water savings attributable to water submeters. Installation of water submeters can result in significant and verifiable water savings. Submetering proponents cite multiple reports that have quantified the per unit water saving at 15% to 30%. A report by the National Multiple Family Submetering and Allocation Billing Program Study, partially funded by the San Diego County Water Authority and the City of San Diego Water Department, concludes that, "**submetering was found to achieve statistically significant water savings of 15.3%.**"

Since capacity fees are based on water demand and the submeters will create significant reductions in demand, capacity fees must reflect these savings. In addition, the city should reevaluate and update its Water Data Card to more accurately reflect the available water saving devices and reassess the per unit demand use to more accurately calculate water demand.

**Exempt High Rise And Affordable Housing Construction From The Submetering Policy**

Mandating submeters in high-rise and affordable housing construction poses significant economic hardship due to the additional plumbing and building modifications needed to comply with the ordinance. High-rise construction would have to deviate from an efficient lateral plumbing system to a more costly and labor intensive loop system. This will result in a significant increase in piping costs and labor. Submetering legislation now before the state legislature (AB1975, Fong) would exempt high-rise construction from submeters for similar reasons and the aforementioned Multiple Family Submetering Report recommends a minimum 4-year delay in high rise submetering in order to provide time to resolve technical issues posed by high rise plumbing configurations.

Another impediment is the fact that “point of use” water submeters are prohibited in California. Point of use meters are permitted in most states and could be easily integrated into conventional plumbing systems. The BIA urges the city to work with its state delegation to pursue legislation to allow these meters to be used in California.

The BIA reaffirms its commitment to work with city officials to craft meaningful solutions to the many challenges we face in this turbulent economy. Your favorable consideration of our comments and recommendations is greatly appreciated.

Sincerely,



Matthew J. Adams  
Deputy Director

sw:mja