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Date: Mon, Sep 22, 2008 at 3:03 PM
Subject: 9-15-08 DWR workshop comments (3)
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Attached are the San Juan Water DIstrict responses to the questions provided at the DWR September 15, 2008 workshop. The responses are brief and general in nature, as appeared to be requested by the form of the questions. If you would like any further detail, or have any questions, please do not hesitate to contact either Lisa Amaral or me at 916-791-0115.

Shauna Lorance
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Comments on 9/15/2008 DWR Workshop

Provided by San Juan Water District

Thank you for the opportunity to provide input into the proposed process for carrying out the Governor's request for 20% reduction in gallons per capita per day water usage by the Year 2020. This is an important process, and one that must be done efficiently and effectively.

1. Program Development Figure 2-1, on page 3 of the Baseline Technical Memorandum, outlines the proposed approach for carrying out the Governor's charge. Is this an appropriate approach? Are there other steps to consider? What changes or revisions should be considered?

   The methodology established in Figure 2-1 is appropriate. However, the data sets and parameters within the methodology cause some concern. With the 20x2020 plan being on the fast track it is important to remember that flawed data leads to flawed analysis. The water supply situation that currently exists in California needs to be resolved utilizing good science and needs to be done once correctly. We do not have time to conduct an analysis that can not be used due to flawed data. Using available sources because they are available isn't a good enough reason. The sources should be accurate and specific to get the best program result.

2. Date Acquisition Page 7 of the Baseline Technical Memorandum provides a summary of datasets related to water use. Are there any other data sets that can help support development of the composite baseline value? (What format are they available in-hardcopy v. electronic; which agency maintains the database; what information is provided; what are the strengths and weaknesses of the data?)

   The workshop and technical memorandum clearly identify limitations to each data set proposed. We believe it is worth the time and effort to acquire a new data set

from water agencies that results from well defined requests for data to ensure that all data is collected, reported in the same manner, and current.

3. Data Validation Data points were eliminated from consideration based on several criteria: incompatible/inaccurate reporting units, no population data, and GPCD results that fell outside the range of 10-2000 GPCD. Should these criteria be modified? If so, how?

   We don't have concern over the range selected but we do have a concern about the data sets within the range. Inaccurate data sets lead to inaccurate or flawed analysis. Just because data falls within the range does not mean the data is valid.

4. Establishing a Baseline Value The proposed approach creates a composite baseline value, using 10 years of data, to help account for variations in hydrologic conditions (dry, wet, average) and demand conditions (e.g. how much conservation in place?). What other approaches could perhaps be used to account for these, or other, factors?

   Establishment of an accurate baseline is critical to get a clear understanding on how much will be accomplished within the program. Using flawed data sets could affect the baseline value, thus affecting the result of the program. With the smaller number of homes per acre within the Sacrament Region as compared to southern California regions, the per capita water usage is logically higher. Using a per acre water usage number would be more appropriate than a per capita in this area. There are agencies within this region that have implemented all of the recommended BMPs (either the Water Forum or the CUWCC) but still reflect a higher per capita usage than areas with smaller lots and less outdoor irrigation. The perception that higher per capita numbers reflect less effort in conservation is absolutely false.

   Using a regional average based on per capital water usage is a concern for the agencies with larger homes and lots, with relatively low per acre water use. Reducing their water usage to the regional average per capital water usage and then by an additional 20% will require the elimination of most outdoor watering.

5. Other Suggestions What other considerations, recommendations, or changes should be factored into the Baseline approach?

   We recognize the urgency to get California's water supply in good health. We believe water use efficiency is an important component of the overall water supply plan, and will coordinate well with the construction of additional surface water storage facilities. We need to be careful using data that could lead to faulty analysis. Agencies want to do their part to improve California's water system but we don't want to rely on a flawed analysis resulting from faulty data. We encourage you to take the necessary time upfront to collect accurate data to ensure no time is wasted during the implementation phase.

Thank you for providing an opportunity to participate in this process. If you have any questions, please do not hesitate to call

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