



John V. Rossi
General Manager

Charles D. Field
Division 1

Thomas P. Evans
Division 2

Brenda Dennstedt
Division 3

Donald D. Galleano
Division 4

S.R. Al Lopez
Division 5

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20 by 2020 Agency Team
Department of Water Resources
1416 Ninth Street
Sacramento, California 94236

VIA EMAIL to:
2020comments@waterboards.ca.gov

COMMENTS REGARDING APRIL 30, 2009 DRAFT OF 20X2020 WATER CONSERVATION PLAN

Dear 20 by 2020 Agency Team:

Western Municipal Water District (Western) appreciates the opportunity to comment on the DRAFT 20x2020 Water Conservation Plan released on April 30, 2009. Western is both a wholesale and retail agency providing water supply and reclamation services to a diverse customer constituency and growing population in arid southwestern Riverside County. As a member agency of the Santa Ana Watershed Project Authority (SAWPA), the sponsor of Senate Bill 261 – a Comprehensive Urban Water Efficiency Act of 2009, Western has fully engaged in the legislative process resulting directly from Governor Schwarzenegger's call for a *plan to achieve a 20-percent reduction in per capita water use statewide by 2020*.

Following a thorough review of the DRAFT Water Conservation Plan, Western can confidently express support for some of the recommendations outlined that clearly and equitably seek to increase the efficient use of water throughout California, but has serious reservations and concerns with select tenets, methods and metrics of the DRAFT document.

Western has been an ardent supporter of SB 261 and believes many of the components within the bill language align with reasonable recommendations outlined the DRAFT

Plan. Examples from the DRAFT Plan that are comparable to the SB 261 language include:

- Water suppliers should be treated consistently and targets should be equitable;
- Allow flexibility in implementation;
- Accommodate, encourage and support emerging regional water management entities;
- Separate approaches are necessary for residential and commercial/industrial water use;
- Initiate coordination and standardization of data collection;
- Automate the submittal of summary information; and
- Existing effective programs should continue (California Irrigation Management Information System and State Landscape Model Ordinance).

Western's concerns with the DRAFT 20x2020 Water Conservation Plan are outlined below:

1. **Gallons per Capita Daily:** Gallons per capita daily (GPCD), when landscape, commercial and industrial consumption are included in the calculation, is not an effective measure of efficient water use. A presumably low GPCD of 123 (region 3) for a coastal community may actually allow for excessive outdoor irrigation, while a higher GPCD applied to inland parks and school yards may represent an inadequate level of irrigation as related to the local Evapotranspiration rate (ET_o). Furthermore, complying with a GPCD mandate should not require residential customers to use less at home simply because water consumption at a local soda bottling plant or food processing facility distorts the local water agency's GPCD; nor should a GPCD value be used to compare one water purveyor, agency or city to another.
2. **Baseline:** Although calendar year 2005 may statistically represent average estimates of regional per capita water use, at Western's local purveyor resolution calendar year 2005 represents the lowest per capital water delivery year of the last nine calendar years. This can be attributed to extraordinary levels of precipitation in winter 2004/05. A performance target defined by this base year is unreasonable and unattainable in the local community. Western's single-family residential GPCD (aggregate use) for 2005 was roughly 199; 25-percent lower than the average of the adjacent calendar years. A reduction to the prescribed

target for the South Coast Hydrologic region of 149 from the local norm represents a substantial reduction in water demand.

3. **Targets**: Constructing a single compliance target for each of the ten hydrologic regions without a clear set of instructions for compliance throughout the diverse landscape within each hydrologic region is irresponsible. The 20x2020 Agency Team has provided the public with a grossly incomplete document lacking the most important component – a well-defined implementation strategy or instruction set that ensures the burden of compliance is equitable shared rather than uniformly dictated. The South Coast Hydrologic Region’s climate ranges from temperate coastal to arid to semi-desert and includes established urban mega-centers such as the cities of Los Angeles and San Diego as well as many smaller cities and rural growing communities such as Corona, Riverside, Lake Elsinore, Murrieta and Temecula. Application of a single target across such a diverse expanse is unreasonable and inequitable. During the public workshops held in the fall of 2008, requests for access to or inclusion in the target development process by multiple participants were rebuffed. The absence of a transparent process for the development of these targets leaves the water agencies and purveyors with the burden of compliance without benefit of insight into potential solutions that may have presented themselves in the process of target development.

4. **Prescribed mandates for reduction without regard for cost**: Many of the recommendations to reduce per capita consumption are prescriptive in nature, lack quantifiable evidence that implementation will yield sustained results and are not simply or appropriately implementable at the local level. A.) Watering restrictions: The prescribed mandate to restrict landscape watering by way of enforced ordinance as a mechanism to permanently reduce consumption or increase efficiency is unreasonable in established, semi-arid climates and labor intensive to enforce. Watering restricted to twice in seven days would require application of more than 1 inch of water per irrigation day in arid climates to meet the demands of cool season turf – most parks and school yard landscapes would wilt under these conditions. Existing restrictions on time-of-day-watering in many communities compress the available window of irrigation and therefore increase the likelihood of run-off with such a restrictive irrigation regime. Additionally, shifting irrigation cycles doesn’t reduce a landscape’s established

need for water. B.) Turf replacement: At well over \$600 per acre-foot of water, in an arid climate, "Cash-for Grass" Turf replacement programs are not locally viable if the only source of financial incentive is the local avoided cost of water. Assuming an irrigator in an arid climate uses twice the required level of water to irrigate a lawn, and removes the turf in favor of a climate-appropriate plant pallet requiring 30-percent of local ETo, the annual avoided cost per square foot equates to \$0.08 – hardly a behavior-changing incentive. C.) Retrofit on resale: The benefits of a retrofit-on-resale requirement are widely known, however the likelihood of universal acceptance in all jurisdictions served by a municipal water district is unrealistic at present and an unreasonable burden to place on the lone purveyor. A retrofit ordinance is best left to the State itself. In the meantime, water purveyors are still required to "hit the hydrologic target" in many cases in order to receive State financial assistance. D.) Weather-based irrigation controllers: Any controller, "Smart", weather-based or self-adjusting, requires human programming and is subject to human behavior. Without long-term support by the controller manufacturer or the local water purveyor, the potential to add additional minutes or cycles to cover an irrigation system's inefficiencies remain – removing any presumed water savings and benefit from the long-term equation. Water agency support through evaluation and education programs remains labor intensive and costly. The water measures outlined in the DRAFT Plan do not assure local agencies will meet compliance requirements. Failure to comply may ultimately close the door to the very funds that increase local efficiencies and supply reliability.

In conclusion, Western Municipal Water District generally supports the Governor's call to reduce per capita consumption through cost-effective advances in water use efficiency. We would request however that greater attention be paid to efficiency rather than simply mandating reductions and further suggest that through transparent inclusive processes all Californians will benefit equitably.

Thank you for considering these comments.



TIMOTHY T. BARR
Water Use Efficiency Manager