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20x2020 Agency Team
Department of Water Resources
1416 Ninth Street
P.O. Box 94236
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Subject: 20x2020 Statewide Conservation Implementation Plan

Dear 20x2020 Agency Team:

The Contra Costa Water District (District) supports the Governor's call to reduce statewide water use and appreciates the opportunity to comment on the draft 20x2020 Water Conservation Plan (Plan). The District has been implementing an aggressive water conservation program for nearly two decades and continues to improve the program every year. The District requests that the following issues be addressed as the Agency Team prepares the final Plan.

Data Standards

The District agrees that a uniform data collection system be created to obtain accurate information on water use and conservation efforts, but recommends that the Department of Water Resources work with the California Urban Water Conservation Council to develop the specific data needs and system design.

Hydrologic Regions

Setting the gallons per capita per day (gpcd) by hydrologic region is a fatal flaw of the draft Plan. Water use cannot and should not be compared between agencies unless numerous specific factors are taken into account. Even then, the preferred method of measuring water use efficiency is to compare an agency to itself. Some of the factors that greatly affect gpcd include:

- Evapotranspiration (ETo) Rate - Landscape water use makes up 50% of the demand in many service areas, and the different ETo rates will dramatically affect this demand.
- Residential Customer Make-up - Areas with high-density housing will naturally have lower gpcd compared to areas with low-density housing.

- Commercial, Institutional and Industrial (CII) Customer Make-up - Agencies with large industrial customers will have higher gpcd than those without. Industrial and commercial water use is directly affected by production. As production increases, water demand will naturally increase.
- Metered vs. Non-Metered - Water agencies with metered services will tend to have more efficient use than agencies without metered services. Metering and billing based on consumption result in more efficient use by the end user.

End Users

The Governor's call for 20% savings was a statewide target, yet the draft Plan puts the responsibility of the savings primarily on retail water agencies. Retail and wholesale water suppliers have achieved a tremendous amount of conservation over the past two decades and will continue to do so. However, a substantial amount of the past savings can be attributed to plumbing code improvements and legislative actions. These actions affect the end user of the water, resulting in long-term water savings. The District recommends the draft Plan layout actions for specific end users. Examples include:

- Require existing state, county and city landscapes to meet landscape water use efficiency standards by a specific date.
- Develop best management practices for water use for various commercial and industrial businesses.
- Develop additional efficiency standards for fixtures and devices. Examples include cooling towers, commercial clothes washers, and restaurant dishwashers.

Metering

The deadline for metering all services in the State should be accelerated. In addition, the District suggests that the State provide financial incentives to install Automatic Meter Reading (AMR) technologies and other "smart" metering technology to gain additional conservation benefits such as providing daily consumption data to assist with leak detection and customer service.

Public Goods Charge

The State should not mandate a public goods charge. Funds can and are currently used much more efficiently at the local level. A public goods charge is inequitable to ratepayers within water agencies that have already made substantial investments in water conservation. The Agency Team should devise other incentives for those agencies that have not invested sufficiently in water conservation.

Recycled Water

The District agrees that recycled water should be excluded from the base period usage so that agencies get credit for recycled water use in their service areas.

Agricultural Water Conservation

The draft Plan acknowledges that agricultural water use must be more efficient for the State to achieve a 20% reduction in water use. However, the draft Plan does not recommend that an agricultural conservation plan be developed. Water management in the Agriculture sector is far from efficient and could provide a tremendous amount of future water savings. The District recommends the draft Plan include a specific and strong recommendation to develop an agricultural conservation plan.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Walter J. Bishop". The signature is written in a cursive style with a large initial "W".

Walter J. Bishop
General Manager

WJB/CD/dmg