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June 5, 2009

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By Electronic Transmission to: 2020comments@waterboards.ca.gov

20 X 2020 Agency Team
c/o California Department of Water Resources
PO Box 942836
Sacramento, CA 94236-0001

Re: Comments on Proposed Final Draft 20X2020 Plan for Urban Water Conservation

Dear Agency Team Members:

The Vista Irrigation District (VID) appreciates the opportunity to submit comments on the 20X2020 Agency Team's (Agency Team) Proposed Final Draft Statewide Implementation 20X2020 Plan for Urban Water Conservation (20X2020 Plan).

VID is a member of the California Urban Water Conservation Council (CUWCC) and is committed to cost effective water conservation policies. The District supports the Governor's objective to reduce statewide per capita water use 20 percent by 2020 and appreciates the efforts of the Agency Team to develop the 20X2020 Plan. However, it appears that many significant policy issues remain to be resolved, and to that end, VID encourages the Agency Team to consider the enclosed Association of California Water Agencies' (ACWA) "Water Conservation and Water Use Efficiency Policy Principles" to develop a final plan to reduce water demand throughout the state.

The District offers the following comments on the 20X2020 Plan:

1. *Public goods charge for water* - VID cannot support the public goods charge for water proposed by the Agency Team without a clearer understanding of the benefits to water users.
2. *Water conservation pricing* - VID does not support the Agency Team's proposal for a mandated statewide water conservation pricing structure. The District feels strongly that decisions regarding water rates need to be made at the local level with input from individuals directly impacted by the pricing structure.
3. *Data collection and evaluation of progress* - The 20X2020 Plan anticipates that the Agency Team/California Department of Water Resources will play the prominent role in collecting data and analyzing progress toward achieving the goal (20% reduction in water use by 2020). VID believes that the Agency Team should consider using existing reporting and data collection mechanisms, such as the CUWCC's BMP reports, to gather data and evaluate progress toward the goal.

VID is ready to work with the state to develop an effective program to reach the objectives of the 20X2020 Plan. The District requests that the Agency Team not finalize the 20X2020 Plan until additional analysis is complete and other alternatives for meeting the Plan's objective are fully evaluated.

Sincerely,



Roy A. Coox
General Manager

Enclosure



ACWA Policy Principles on **Water Conservation and Water Use Efficiency**

While California has made great strides in water conservation and efficiency in recent years, the collective impacts of drought, climate change, increased population demands, court ordered supply reductions and potential natural disasters make it clear that all water users will have to do much more in coming years.

The Association of California Water Agencies is adopting these Policy Principles to help frame the key issues that must be addressed and institutionalized to realize the significant forward progress that Californians must make to address the challenges before us.

The terms “water conservation” and “water use efficiency” are often used interchangeably, but are considered by some to have different meanings. “Water use efficiency” as used here means using water more efficiently to reduce water demand for a given set of beneficial uses. The term “water conservation” is used to mean any reduction in applied water use.

These Policy Principles are interdependent and each is an indispensable part of a comprehensive water use efficiency policy. These Policy Principles should be understood in reference to and in the context of the ACWA Blueprint and other applicable ACWA Policy Principles.

- 1. Importance of Water Conservation and Water Use Efficiency.** Water conservation and water use efficiency are central elements of the state’s strategy to enhance water supply reliability, restore ecosystems, and respond to climate change and a growing population. While much has been accomplished in the past, significant increases in water conservation and water use efficiency will be required to assure reliable water supplies in the future.

2. The 20 x 2020 Goal. ACWA supports the Governor's statewide goal to reduce per capita water use 20 percent by 2020, which translates into a statewide aggregate of 1.74 million acre-feet of additional conserved water, through the implementation of measures consistent with these principles throughout the state toward accomplishment of this goal. ACWA understands that a proposed 20 percent per capita water use reduction goal is an aggregate statewide goal. ACWA intends to work with the water industry, state agencies, and other stakeholders to create a policy framework and sound technical methodology that will effectively assure that the goal of reducing statewide per capita water use is achieved.

3. Statewide Effort. Accomplishing water conservation and water use efficiency goals will require statewide action by all water users, including residential, commercial, industrial and agricultural water users, local and regional planning agencies, state and federal agencies, chambers of commerce, and business, commercial and industrial professional and trade associations.



4. Comprehensive Solutions. Water conservation and water use efficiency must be part of a comprehensive solution that includes local resource development and infrastructure improvements, including storage and conveyance, as part of a statewide system that promotes economic and environmental sustainability. Reducing water use where appropriate and using water as efficiently as practicable is essential, but cannot in themselves accomplish the coequal objectives of water supply reliability and ecosystem recovery.



5. Local Management. ACWA believes that water conservation and water use efficiency programs will only be successful if local water agencies, which are overseen by locally-elected officials, are responsible for designing and implementing them. Many water agencies in California face the prospect of diminishing supplies and growing demands, and they are accountable to their customers and to regulatory agencies to make locally cost-effective decisions to provide reliable water supply in a manner that protects the environment. Water conservation and water use efficiency programs are indispensable tools in meeting these goals.

6. Monitoring, Reporting, and Accountability. ACWA supports the implementation of programs to assure prudent measurement and monitoring of water use to provide accountability and transparency toward the accomplishment of water conservation and water use efficiency goals. Water Management Plans for both agricultural and urban agencies should be updated regularly and provide quantitative and transparent information on water conservation and water use efficiency programs. ACWA supports the use of volumetric pricing for urban and agricultural water wherever appropriate.

7. Incentive-Based Programs. Water conservation and water use efficiency programs that rely on incentives, such as conservation credit programs or pricing mechanisms, or model practices, will be far more effective and permanent than those based on the enforcement of mandates by the state or other entity.

8. Basin-Wide Approach. Improvements in water use efficiency should be considered from a basin-wide perspective. Water use efficiency actions should focus on reducing irrecoverable water losses while reasonably supporting beneficial uses in the basin. Water use efficiency actions that reduce recoverable losses should address and mitigate any redirected impacts within the basin. Water use efficiency measures may have both direct



and indirect benefits, both in and out of the basin. Actions that reduce applied water use but do not result in net water supply benefits to the water basin may be justified if they can be shown to advance other local policy objectives, including stream flow, water quality, ecosystem restoration, energy, or flood control.

- 9. Protect Water Rights.** Implementation of water conservation and water use efficiency programs must be consistent with existing state law in that the act of conservation cannot be allowed to undermine the water rights of the entities implementing the water conservation or water use efficiency program, or interfere with existing water conservation or water use efficiency projects. State policy should affirm that undertaking aggressive water conservation and water use efficiency will preserve, not diminish, water rights. The intent of this principle is to ensure that water agencies and water users in the basin implementing water conservation and water use efficiency actions benefit from those actions and are not harmed by measures that may provide benefits outside the basin.
- 10. One Size Does Not Fit All.** Water conservation and water use efficiency programs must have the flexibility to adjust to widely varying local circumstances. One size does not fit all and a policy based on this premise will fail. ACWA opposes imposition of uniform statewide water use standards or water use reduction targets. Effective water conservation and water use efficiency programs must be responsive to local circumstances, including changing water supply sources, water uses and demands, and water reliability challenges.
- 11. Urban Water Conservation and Water Use Efficiency.** In urban areas, ACWA advocates the implementation of residential and commercial retrofit programs, innovative pricing strategies, water efficient landscaping, including implementation of urban Best Management Practices (BMPs) specified by the California Urban Water Conservation Council's (CUWCC) Memorandum of Understanding (MOU). ACWA supports continued improvements to the BMPs as a tool for enhancing water conservation and water use efficiency. Where appropriate, ACWA advocates additional measures consistent with these principles to advance local water supply reliability goals and to help achieve the statewide 20x2020 goal.
- 12. Agricultural Water Use Efficiency.** In agricultural areas, ACWA advocates incentive-based programs to implement the Agricultural Water Management Council's (AWMC) Efficient Water Management Practices (EWMP's). ACWA supports continued improvements to the EWMPs as a tool for enhancing agricultural water use efficiency. Where appropriate, ACWA also advocates additional measures (including exploration of innovative water pricing mechanisms) consistent with these principles that will result in reduced system losses when a net savings to the system results. The overriding goal is to achieve more-efficient water management than currently exists to meet local water supply reliability goals and assist in statewide water management.



13. Local Water Resource Development. Increasing water reuse (recycling), cleaning-up polluted or otherwise unusable groundwater, and desalination and development of stormwater recharge and water banking facilities can be critical components of a comprehensive water use efficiency program by increasing local water supplies and reliability. Water that is locally-developed through recycling, desalination or other reuse from water sources should be credited toward local water use reduction goals.

14. State and Federal Support. The state and federal governments should provide technical assistance where appropriate, financial assistance through bond funds, appropriations, and other sources to encourage water conservation and water use efficiency practices. ACWA supports removing regulatory and other constraints that unnecessarily impede local resource development and promote policies to encourage such development.

15. Public Outreach and Education. Successful water conservation and water use efficiency programs require extensive public outreach and education. Reducing usage will require significant changes in water use behavior, which must be marketed by outstanding public outreach and education programs. ACWA and its member agencies remain committed to these programs and will aggressively promote water conservation and water use efficiency consistent with these principles.

