



September 29, 2008

Via email: 2020comments@ccp.csus.edu

Re: 20X2020 Public Draft Technical Memoranda, Task 1 and Task 2

Dear Members of the 20x2020 Task Force:

On behalf of the Natural Resources Defense Council (NRDC), and Sierra Club California, we are writing to offer comments on the September 2008 *Public Draft Technical Memorandum Task 1 – Establishing Baseline* (TM 1) and *Public Draft Technical Memorandum Task 2 – Establishing Targets* (TM 2) produced by the 20x2020 Team.

NRDC and the Sierra Club have long advocated for the implementation of water use efficiency programs to help meet California's water resource needs. We are particularly pleased that both of the Public Draft Technical Memoranda note that "legislative, regulatory, and administrative agencies at the federal, state, regional, and local levels are now focusing more actively on water conservation in a primary position to responding to California's current climate conditions and challenges for future water supply." (TM 1 and TM 2, p.1.) We strongly support this placement of water efficiency as the priority resource. Consistent with that focus, we support Governor Schwarzenegger's directive for the State to reduce per capita water use by 20 percent by 2020.

We understand that there are numerous technical issues to be resolved in developing a plan to meet the 20 percent target and appreciate the opportunity to participate in the process. We commend the 2020 team for identifying these issues and acknowledging that the results presented in the technical memoranda are preliminary. These memoranda reflect significant effort in a short period of time, but we agree that additional analysis and substantial clarification is necessary before these results are finalized.

I. Scope of Program

Agriculture: Eighty percent of applied water in California is used for agriculture. The Pacific Institute recently released a report that shows increased potential for agricultural water use efficiency reaching up to 3.4 million acre-feet per year, significantly higher than previous estimates. The 20x2020 Plan acknowledges the need for agricultural water conservation, saying "to achieve a reduction in overall water use while protecting the Delta's ecosystem, it is recognized that reductions in urban *and agricultural water use*

need to be achieved.” (emphasis added) (TM 1, p. 2.) However, it then goes on to note that this Program focuses exclusively on urban water use efficiency. The governor’s directive did not exclude agriculture. To ensure an equitable approach that has all water users contributing to balancing the state’s water supply and demand, the 20x2020 team should identify a comparable process and time frame to develop the agricultural component of this plan.

II. Establishing the Baseline

Data Collection: The technical memoranda correctly identify the abysmal state of water use data in California. It is almost incomprehensible that in 2008 the best available data is found scattered throughout the state in Department of Public Health (DHS) offices and is only available in hard copy instead of electronic format. The consolidated water use database envisioned by AB 1404 would go a long way in improving data availability. As part of the 2020 process the state should develop and commit to a timeline and funding to develop and maintain this database. The state should immediately require all water use data be submitted in electronic format. Additionally, the state should begin the process of consolidating this data into a form that can be used to more accurately set a baseline and targets for this 2020 process.

Defining a Base Year: We are concerned that the 2020 team proposes to use 2000 as a baseline year. The ultimate goal of the 20x2020 plan is to reduce per capita use 20 percent from 2008 levels. By starting in 2000, we may be reducing the impact of this program by a significant percentage. Given the paucity of data, we do not have enough information to determine the impact of choosing 2000 as a baseline, but unless subsequent analysis shows per capita water use to be virtually unchanged since that date, we ask that a more recent baseline be selected, or that a process be developed to adjust the targets once more recent water use data is consolidated and verified.

III. Requests for Additional Clarification

We have not had time to adequately review the assumptions and calculations for each of the hydrologic regions. However, our initial review did raise the following questions. We request further clarification of certain points or decisions:

Clarify targets for Regions with Relatively Low Per Capita Water Use. TM 2 states that “the “balancing” approach recognizes those who are already below the 154 GPCD target by expecting them to maintain this level of consumption”. (TM 2, p.4.) It also, however, states that **all** regions are responsible for contributing some level of water conservation in order to help the State achieve the target of 154 GPCD. (TM 2, p. 5) We would like further clarification. In general, we support the concept that all regions should contribute to meeting the state target, while we also recognize that it may be appropriate to set some level, perhaps 100 GPCD, below which an individual water agency is not expected to further reduce its per capita use.

Clarify the relationship between targets for Hydrologic Regions and Targets for Water agencies. TM 2 states that “the proposed regional targets may not translate well into targets for individual water suppliers.” (p.2.) We would appreciate further clarification on how regional targets will be translated into targets to which each water agency will be held accountable. Additionally, both the Task 1 and Task 2 memoranda state that the information presented “is not intended to support regulatory decisions.” We urge the Team to address any weaknesses or gaps in the analysis so that the information can be used to support regulatory decisions.

Clarify the methodological reason for standardizing the indoor water use baseline, as described on pages 11-12 of TM 1. What are the implications of that decision? How does that affect either the targets, or the baseline?

Clarify the treatment of multi-family (MFR) water use data. TM 1 says that indoor and outdoor water uses for the multifamily sector are not evaluated because it is assumed that MFR houses share common irrigation areas such that outdoor per capita would be negligible.” (TM 1, p.12.) Does that mean that potential savings in outdoor water use in the multifamily sector is not reflected in the targets? If so, please provide additional justification or evidence for that decision.

Identify the steps that will be taken to improve the data for Region 2? TM 1 notes that 17 percent of the available data representing 36 percent of the population was eliminated during the data validation process for this region. Please identify the process to address this shortcoming.

Correct the percentage reductions in Table 3-1. Many of the percentage reductions listed in Table 3-1 are incorrect. For example, reducing the GPCD in Region 10 from 346 to 194 is actually a 43% reduction, not a 57% reduction, as shown in the table. Similarly, reducing GPCD from 285 to 181 in Region 7 is a 37% reduction, not a 47% reduction.

Overall, we commend the team for its progress towards developing a baseline and conservation targets, and look forward to further participating in this process. We anticipate that other issues, such as enforcement, or consequences for not meeting per capita targets, will be addressed in subsequent memoranda. Thank you for considering our comments

Sincerely,



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