

From: **Amaral, Lisa** <[LAmaral@roseville.ca.us](mailto:LAmaral@roseville.ca.us)>  
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To: [2020comments@ccp.csus.edu](mailto:2020comments@ccp.csus.edu)

Please accept the City of Roseville's comments on the questions posed at the 9/15/08 Water Conservation Statewide Implementation Plan workshop.

Thank you  
Lisa Amaral  
Water Conservation Administrator  
916-746-1710

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20% GPCD Reduction by 2020  
Baseline Discussion  
Comments on 9/15/2008 DWR Workshop on behalf of the City of Roseville

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. Using available sources just because they are available isn't a valid reason if the data sources are not complete. 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 in a consistent and defined format 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. Obtaining a complete set of data to start the effort should be the place to start. It will also provide the opportunity to refine the reporting requirements that will be required in the future to identify compliance with the goals.

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?

As recognized, annual variations in weather conditions (temperature and rainfall) as well as socio-economic conditions affect water use. A 10 year average is a manner of addressing these issues. The only other manner would be to utilize a baseline usage within an agency (snapshot of existing water conditions) and then adjust that based on historical variations in temperature, rainfall, and economic conditions. This is likely not an accurate estimate of "normalized" water use.

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. As stated in the memorandum, the agencies located within the Sacramento River Region are just installing meters and have just begun to ramp up their water conservation programs. Because of this, a more appropriate unit of measurement for this region is total water use (acre-feet) within each agency as opposed to per capita usage. There are agencies within this region that have implemented the BMPs (either the Water Forum or the CUWCC) but still reflect a high per capita usage. Using a regional average is a concern for the high per-capita agencies as they will be required to reduce their usage to the regional average and then by an additional 20% or more to reach the stated target goals for the region. .

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, as well as additional storage options. 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.

Submitted by Lisa Amaral  
Water Conservation Administrator  
City of Roseville  
2005 Hilltop Circle  
Roseville, CA 95747  
916-746-1710