



## San Diego County Water Authority

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December 5, 2008

20 X 2020 Agency Team  
Department of Water Resources  
1416 Ninth Ave  
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#### MEMBER AGENCIES

Carlsbad  
Municipal Water District

City of Del Mar

City of Escondido

City of National City

City of Oceanside

City of Poway

City of San Diego

Fallbrook  
Public Utility District

Helix Water District

Olivenhain  
Municipal Water District

Otay Water District

Padre Dam  
Municipal Water District

Camp Pendleton  
Marine Corps Base

Rainbow  
Municipal Water District

Ramona  
Municipal Water District

Rincon del Diablo  
Municipal Water District

San Dieguito Water District

Santa Fe Irrigation District

South Bay Irrigation District

Vallecitos Water District

Valley Center  
Municipal Water District

Vista Irrigation District

Yuima  
Municipal Water District

#### OTHER REPRESENTATIVE

County of San Diego

Subject: Comment Letter-Governor's Statewide Conservation and Implementation Plan TM 4 and TM 5

Dear 20 X 2020 Agency Team,

The San Diego County Water Authority appreciates the opportunity to comment on the Governor's Statewide Conservation and Implementation Plan TM 4 and TM 5 as discussed at the November 20, 2008 Workshop. TM 4 and TM 5 address the ability to achieve the governor's goals from current actions and potential future actions. TM 5 proposes new actions and ideas for legislation that could be taken to achieve the goals; however most of the proposed actions are related to decisions that should be made at the local level and not at a State policy or legislative level.

Instead of mandating the specific actions that should be taken at the local level, the 20 X 2020 team should be focusing on larger policy level questions. This includes developing statewide approaches that could be used by water agencies to set their water conservation targets and providing assurances that agencies will not lose water rights by implementing conservation programs. Water agency targets should be scientifically based on beneficial uses within the water agency's service area. Specific conservation measures and priorities should be at the discretion of the local agency.

We would like to comment on the following specific issues addressed in TM4 and TM 5:

Savings estimates due to voluntary water conservation efforts: TM 4 includes an estimate of savings due to voluntary conservation measures if water agencies continue with the status quo. This estimate is based on implementation of the cost effective Best Management Practices (BMPs) of the California Urban Water Conservation Council (CUWCC) that have been in place since the 1990s and fails to recognize the current state of the art for water conservation in 2008. As a result the memorandum underestimates the potential for voluntary water conservation. On December 10, 2008, the CUWC will vote to update the BMPs. If adopted implementation of the new

BMPs will be expected to increase the level of water savings through the use of new technologies and new approaches to change the way people use water in California.

Regional goals for conservation: TM 2 set regional goals for conservation without the benefit of an assessment of the conservation potential under the BMPs and Code requirements. Based on the assessment in TM 4, we recommend that the 20 X 2020 team re-evaluate the regional goals.

Accelerate metering deadline: The Water Authority supports metering of all customers in the State as soon as possible.

Strengthen the “loading order” in the Water Code: A loading order, which sets priorities for development of water supplies is not appropriate. This concept is inconsistent from the California Water Plan and principles of integrated regional water management planning, which encourage development of diverse water supplies. Under the current statewide water supply shortages, water agencies need to develop local supplies and increase diversity of water supplies to ensure a reliable supply of water for their customers. This is a local decision that is based on the extensive planning that is required for the Urban Water Management Plan.

Require more aggressive water conserving pricing structures: While water conserving pricing structures are an effective approach to encouraging water conservation, pricing and water rates are a matter of local control and should not be regulated at the State level.

Require partial or total conservation offsets for new development: While offsets for new development can be an effective approach for implementing conservation, this is a matter of local control and should not be mandated or implemented through the state. Local agencies currently have the authority to require conservation offsets for new development. This is also more appropriately a planning issue that is addressed through the Urban Water Management Plan and in SB 221 and SB 610 requirements for Water Supply Assessments and Verification.

Proposed changes to the MOU and BMPs: The Water Authority supports the CUWCC MOU and BMPs as a good approach for water agencies to meet water conservation goals.

Conservation Credits: The concept of credits as it is applied in the energy sector can not be applied to water agencies in the same manner. A water conservation transfer program may be more appropriate. The State should assure that water agencies implementing programs resulting in excess conserved water will not lose their rights to the water.

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Agencies should be encouraged to transfer their excess conserved water to other agencies that are willing to purchase that water.

Thank you for the opportunity to provide comments. If you have any questions regarding this letter, please contact Toby Roy at (858) 522-6743.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping, sweeping lines that form a stylized representation of the name Ken Weinberg.

Ken Weinberg  
Director of Water Resources