

2020Comments - Comments on 20x2020 Plan

From: "Christopher Alakel" <CAlakel@prcity.com>
To: <2020comments@waterboards.ca.gov>
Date: 5/22/2009 3:35 PM
Subject: Comments on 20x2020 Plan

City of Paso Robles Comments on 20x2020 Plan:

1. Paso Robles is located in Zone 3 (Central Coast), with a proposed baseline water use of 154 gpcd and a 2020 target of 123 gpcd. However, due largely to climate differences, Paso Robles average year water use is approximately 245 gpcd. Based on climate, **Paso Robles should be more appropriately grouped with Zone 6 (San Joaquin)**, which has a baseline usage of 248 gpcd and a 2020 target of 174 gpcd (31 % reduction).
2. If Paso Robles is held to the Zone 3 baseline and the 2020 conservation target, **water use will need to be reduced almost 50% to reach the 2020 goal** of 123 gpcd. This is an unreasonable and unachievable level of reduction.
3. Agencies that have documented historic production and water sector demands should not be held to a capricious baseline. Where possible, a community baseline should be established based on actual historic use.
4. Page 2 states “The Governor’s charge was to achieve a 20% reduction in per capita use, which implies an urban focus.” Given the magnitude of the effort the Governor’s charge should be apparent and succinct. The Governor’s statement can just as easily be interpreted to “imply” that a total reduction in the statewide gross per capita consumption is required. Such an interpretation would result in a SUBSTANTIALLY greater level of water conservation, by including other larger use sectors such as agriculture. It seems that urban use is being solely targeted as it is easier to regulate. Agriculture can not be left out of this discussion. The fact that the Plan gives only of few token words on agricultural conservation is rather inciting.
5. Page 28 includes the recommendation to “mandate conservation pricing.” The City of Paso Robles has been struggling for several years to implement conservation pricing. As a result of Proposition 218, not only has the City been unable to establish pricing that encourages conservation, it is unable establish pricing sufficient to pay for desperately needed infrastructure upgrades. This proposition must be amended to exempt water related services from the process. Pricing is one of the single most effective methods of changing water consumption behavior, and does not require a massive expansion of bureaucracy to accomplish.
6. Page 34 recommends limiting landscape watering to only 2 or less days per week. Most existing landscapes would not survive the high summertime temperatures in the inland areas of Zone 3 if water was limited to only one or two times per week. This would greatly impact on the City’s aesthetic resources. Conversion of most residential and municipal landscapes to low-water varieties will impose great financial burden on the community.
7. If implemented this plan will result in an unnecessary expanse of bureaucracy. With conservation pricing (requiring amendments to prop 218), the Model Landscape Ordinance, Urban Water Management Planning act, and implementation of the established UWMP BMPs - 20% urban water conservation is achievable. The best approach to urban water conservation is to

enforce currently established rules and regulations.

Christopher Alakel, P.E.

Water Resources Manager

City of El Paso de Robles

1000 Spring Street

Paso Robles, CA 93446

Phone: 805-227-7200 ext. 7715

Fax: 805-237-3904

calakel@PRCity.com