



Environmental Utilities
Water Division
2005 Hilltop Circle
Roseville, California 9574

June 8, 2009

To: 20x2020 Interagency Team
From: Ed Kriz, City of Roseville, Water Utility Manager
Re: Comments on 20x2020 Water Conservation Plan

The Governor has requested a 20% reduction in urban water use by 2020. The California Department of Water Resources developed a statewide implementation plan to meet this goal and is requesting comments on the final draft implementation plan. This letter is to voice the City of Roseville's concerns with the plan as written and to echo the concerns specified in the response letter submitted by the Regional Water Authority.

Benefits are not optimized by the methodology chosen

In 2009, the Governor proclaimed a statewide drought emergency. The impact of this third dry year, however, is not a uniform statewide water shortage. Instead, certain regions of the state, especially those dependent on exports from the Delta, are facing shortages. Region 5 has normal, or near normal, water supplies for 2009. The interagency team had an opportunity to develop a plan to maximize water conservation in the regions most in need of improved water supply reliability (such as regions 2, 3 and 4) but instead allocated a disproportionate 30% reduction in water use to Region 5.

Delta Solution

It seems that the plan lost the original focus of the Governor's directive to identify conservation targets to maximize the reduction of Delta exports. Although the plan correctly identifies the Governor's original intention that 20% conservation should be a part of a plan for improving the Delta, none of the analysis in the plan attempts to consider the benefit to the Delta of conservation in any region.

When water conservation policy is focused on the Delta, local supplies that are used within the Delta watershed must be treated differently from Delta exports, which irretrievably remove water from the Delta. Over 42% of the water used in the Sacramento area returns to Delta tributaries, where the water serves environmental needs or provides supplies for other regions through the Central Valley Project and the State Water Project. On the basis of "net" water use from the Delta watershed, the Sacramento area is below the current statewide average gpcd and approaches the proposed 2020 statewide target.

Limited data create an inequitable result

The plan is founded on an estimate of the statewide average water use, and on the premise that all regions should strive to reach a statewide target derived from this average. When the weighted average is driven by $\frac{3}{4}$ of the State's population that lives in the coastal hydrologic regions (Regions 1-4), with cooler climates and prior conservation that was driven by expensive and unreliable water supplies, it is a given that the remaining regions will have higher water use reduction and assigns disproportionate responsibility for reductions to Regions 5-10. This approach is inequitable and misses the opportunity to drive extraordinary conservation measures where they are truly needed to improve water supply reliability.

The plan contains no analysis of whether the water saved in a given region will benefit the conserving water users, other water users, or the environment and fails to recognize water user's right to retain the water they conserve under Water Code section 1011.

The regions with the most expensive conservation programs tend to be those in which the cost of water supplies is the highest, driven by high operational costs and the high avoided costs of alternative supplies. The plan itself demonstrates the differences in “true costs” of water (Table 6, on page 19) when it indicates that none of the identified conservation measures would be cost effective in Region 5. Although the Sacramento area is often perceived as one of the areas where the price of water is too low, the area actually has a better record of compliance with BMPs than the statewide average.

Focusing on regional planning and regional self-sufficiency will help craft an equitable plan

For the past several years, the state of California has promoted two overriding water policy principles, first that regions should strive to improve water self-sufficiency, and second that local agencies and regions should develop a toolbox of strategies to meet water supply reliability needs through integrated regional water management. The City of Roseville has invested significant amounts of financial resources toward the development of a recycled water program as well as an Aquifer Storage and Recovery system. Roseville has accelerated its meter retrofit program and will be fully metered in the year 2011. Roseville has also dedicated significant resources to expand its conservation programs. This dedication to resource management validates Roseville’s commitment to self-sufficiency. However, due to ample water availability in areas such as Roseville that make the cost of water inexpensive, we would like to be assured that state funding be focused in region 5 to assist with the cost/benefit factor.

Recommendations are premature

While the recommendations include many actions that would be generally viewed as beneficial, we have a number of concerns.

1. The plan should not propose that the Legislature enact targets that admittedly are based on inadequate data, nor should we expect that the legislature can improve on the targets using the same limited data.
2. In light of the current state financial crisis, actions such as water efficient landscapes at state-owned buildings, standards for efficient clothes washers, and promised grant funding may not come to fruition. While the plan proposes there be consequences for noncompliant water suppliers, what will guarantee the state will uphold its commitments to successfully implement the plan?
3. Regional self sufficiency should be considered into the plan. The cost effectiveness of conservation measures in relation to other water management tools varies dramatically among regions because the actual availability and cost of the region’s respective water supplies varies dramatically.
4. CII sectors should be addressed in the plan and accommodations given to those that have a strong commercial sector.
5. The plan offers no insight into how individual agencies would be compared to regional targets. Just as regions vary at the statewide level, communities vary in climate, land use and other factors within each region. In addition, it should be remembered that in areas where conservation is most needed there is a natural consequence, water shortages.

Thank you for your opportunity to comment. I urge you to refrain from finalizing the 20x2020 document pending consideration of other alternatives and additional analysis. A bottom up approach where each region and water supplier identifies its planned water conservation, should be evaluated with respect to the 20x2020 goal.

Sincerely,

Ed Kriz
City of Roseville
Water Utility Manager