

2020Comments - Clean Water Action Comments

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Subject: Clean Water Action Comments

Thank you for the opportunity to comment on the **20x202 Water Conservation Plan Draft**. I appreciate the effort that went into this draft, and strongly support many aspects, including an emphasis on data collection, a public goods charge to raise funds for conservation, and the development of a public education campaign.

We do feel that this plan could be substantially improved as follows:

1. This plan completely fails to note the differing needs and challenges of disadvantaged and rural communities. These communities lack the economy of scale to fund conservation programs and the cost of installing meters. Additionally, severe infrastructure deficiencies lead to high levels of water loss as do many water treatment methods. The State Board should develop a specific goals targeted at achieving conservation in these, including
 - a. Monitoring the effectiveness of conservation programs in reaching low-income water users
 - b. Developing conservation programs at the state level that can be accessed by small or disadvantaged communities that cannot run their own programs
 - c. Targeting funds to address leaking infrastructure in disadvantaged communities
2. I strongly disagree with the decision not to include multiple benefit proposals that save water and improve water quality – specifically Low-Impact development, stormwater capture, and graywater reuse. The Water Board is an ideal agency to implement the 20x2020 plan *because* they look at a broader range of issues – unfortunately, this report is one-dimensional.
3. Technology. I agree that installation of water meters is essential to meeting the goals of the plan. However, this plan should also recognize the increasing use of Advanced Metering Technology to help identify and reduce individual water use. Additionally treatment of contaminated water adds to water loss; funding research into new technologies that use less water could save water, energy and perhaps money. In addition, it isn't clear how technological advances will be incorporated into this plan.
4. Legislative initiatives. I'm disappointed that this plan does not clearly identify legislative or regulatory changes that could advance the efforts, such as a state mandate for new development, or a retrofit requirement on resale of home.

Thank you,

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