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Date: 5/22/2009 2:51 PM
Subject: Comments to 20x2020 Water Conservation Plan due 5/22/2009

ESTABLISH A FOUNDATION FOR A STATEWIDE CONSERVATION STRATEGY

Non-profits and/or foundations are not the answer.

No target projections will work in urban areas without the incorporation of Land Use Management and Conservation Elements of the State-mandated General Plan.

This is not a water agency approach. It involves the Planning Departments, Building and Safety Departments, Departments of Recreation and Parks, and Fire Departments on a municipal level.

It may involve units that work with affordable housing such as a Housing Department or Housing Authority or Community Redevelopment Agency.

It may involve units that approves or advises on affordable housing funding such as a Citizens' Unit for Participation or equivalent, under Federal Department of Housing and Urban Development HUD guidelines or the State committee such as CDLAC California Debt Limit Allocation Committee.

REDUCE LANDSCAPE IRRIGATION DEMAND

Include stormwater runoff in this planning. We refer you to the City of Los Angeles , Bureau of Sanitation Structural BMP Prioritization and Analysis Tool SBPAT in experimental phase. The key contact is Reza Iranpour, Assistant Division Manager, Watershed Protection, Bureau of Sanitation.

IMPLEMENT A STATEWIDE CONSERVATION PUBLIC INFORMATION AND OUTREACH CAMPAIGN

This is difficult. The state needs to be divided into ECOREGIONS.

Consider the term ECOREGIONS. Consider the possibility of GIS mapping that could include:

- Watershed
- Wildlife Corridors
- Migratory Birds
- Fish Corridors
- Open Space
- Parks
- Trails
- Equestrian

In other words, brand water, watershed and hydrology into issues of interest that cross borders, both nationally and internationally.

From those groups already established in their areas of interest, then spread a campaign out to the public. Environmental groups, Boy Scouts, Girl Scouts, hobbyists, schools, homeowner and neighborhood governance groups then can share a like subject and goal. Preservation is on self-interest. Take that self-interest out of just the landscaping in a backyard and integrated uses. The Integrated Regional Water Management Plans IRWMPS need to cover quality of life issues and not just water agency issues.

Environmental justice issues can be addressed in terms of Disadvantaged Communities, those communities living in grandfathered pollutants, from businesses and oil fields.

Landfills and their pollutants affect the groundwater. Those landfills are not segregated to Disadvantaged Communities—they include middle class neighborhoods.

INVESTIGATE POTENTIAL FLEXIBLE IMPLEMENTATION MEASURES

A. INVESTIGATE REQUIRING CONSERVATION OFFSETS FOR WATER DEMAND GENERATED BY NEW DEVELOPMENT.

B. INVESTIGATE ESTABLISHMENT OF A CAP-AND-TRADE REGIME.

Now you have caused the problem and not solved the problem. This is not about offsets. Reduction and conservation is not about offsetting more affluent users to be able to get what they want because of their financial situation.

This plans priority should be conserving water for daily use for a quality of life goal.

The California economy has tumbled. Get real; plan for the average person and not the special interests.

INCREASE THE USE OF RECYCLED WATER AND NON-TRADITIONAL SOURCES OF WATER

Missing here is the cost-benefit analysis, per city, per county, per state, per water agency, per watershed, per IRWMP etc etc for the new infrastructure needed for recycling.

WATER CONSERVATION IS ALSO AN ATTRACTIVE WATER MANAGEMENT STRATEGY BECAUSE IT CAN YIELD MULTIPLE BENEFITS

There is no definition of MULTIPLE BENEFITS nor is there a mechanism of monitoring and measuring MULTIPLE BENEFITS.

In the City of Los Angeles , MULTIPLE BENEFITS means parks.

THIS 20X2020 PLAN

ADDRESSES ONLY URBAN WATER USE AND CONSERVATION

ADDRESSES ONLY POTABLE WATER USE

DOES NOT CONSIDER PROCESSES THAT CONVERT A NON-POTABLE SOURCE INTO A POTABLE SOURCE AS METHODS TO REDUCE PER CAPITA USE, SINCE THEY ARE NEW SUPPLY OPTIONS

DOES NOT ADDRESS WATER SUPPLIED BY CUSTOMERS FOR THEIR OWN USE OR CONSIDER PROCESSES THAT CREATE NEW SUPPLY ON THE CUSTOMER SIDE OF THE METER

DOES NOT ADDRESS WATER LOSSES IN TRANSMISSION OF WATER BETWEEN SOURCES OF SUPPLY AND POTABLE WATER TREATMENT AND DISTRIBUTION SYSTEMS

RECOMMENDS ACTIONS THAT WILL REDUCE PER CAPITA USE, NOT TOTAL URBAN USE, BY 20 PERCENT

IS BASED ON ANALYSES CONDUCTED ON A REGIONAL AND STATEWIDE BASIS

This is the beginning framework for urban areas to start planning locally. Again, GIS mapping and other tools can start the identification process. Statements are nice, but mean nothing.

Development should not be considered KING in California , the individual should. With that, water can be used presently, as in the past, as an economic planning tool.

Start by watershed, then neighborhood, then block. Apply those to cities, then counties, then watersheds, then regions.

Plan, plan, plan, plan, plan—the more local, the more real; the more engaged, the more effective.

In how many languages do you plan to translate?

This 20X 2020 Conservation Plan needs to be incorporated into the IRWMP plans, the Integrated Resource Plans IRP, annual Infrastructure Reports, the General Plans, the Community Plans and any Specific Plans.

Population counts as king in the City of Los Angeles and the County of Los Angeles . Where are the plans to overlay Economic Development Zones over population zones to use as guidance?

Overlay State Enterprise Zones.

What forum is being used for building code change discussion?

In a time of economic uncertainty and high unemployment rate, those individual adjustments in the purchase of new equipment or the landscaping of a yard are not an answer for this time.

Fire needs are not address in this document.

The State budget crisis limitations are not addressed in this document.

Power needs including the renewable energies are not addressed in this document.

The Public School System is a state system, yet they are not at the table and are considered an arms-length customer. They are not. School Districts and Charter Schools are a State agencies.

ESTABLISH A FOUNDATION FOR A STATEWIDE CONSERVATION STRATEGY

No, use what we have already and engage those interested non-profit corporations and INDIVIDUAL CITIZENS into the process. Make the IRWMPs go beyond the water agencies into the real world. Make elected officials accountable in this process and let them decide to make Water Conservation part of the platform and part of the budget.

ESTABLISH A STATE AGENCY LEADERSHIP AND COORDINATION FRAMEWORK

There is no budget for this one. What is the financing mechanism? When will the issue be part of the California Environment Quality Act process?

REDUCE LANDSCAPE IRRIGATION DEMAND

Older neighborhoods and new developments need separation and analysis. How are these older urban areas being addressed?

MANDATE THE LANDSCAPE IRRIGATION BMP

There needs to be a time given for the local governments to include these BMP in their Land Use planning including General Plans, Water Elements, Conservation Elements, Open Space Elements, Infrastructure Reports, Community Plans and Specific Plans.

REQUIRE WATER EFFICIENT LANDSCAPES AT ALL STATE-OWNED PROPERTIES

Yes, start the example.

REDUCE WATER WASTE

Non-reported water waste needs to be addressed. This issue is being challenged in individual lawsuits, while the State still does not address that issue.

PROVIDE FINANCIAL INCENTIVES

The assumption here is that everyone wastes. How does the conservationist continue to conserve, without being financially penalized.

ESTABLISH A PUBLIC GOODS CHARGE TO PROVIDE STABLE FUNDING FOR WATER MANAGEMENT

“California does not have adequate funding mechanisms in place to ensure the needed investment in water management improvements over the long term.”

This is not necessarily a true statement. The five-year Infrastructure Reports are not always filed by municipalities. There is not enforcement or oversight, other than a citizen-lawsuit and the courts.

That lack of planning needs to stop at the local level. With proper planning, revenues can be used for operations and maintenance and long-term bond planning can occur for infrastructure investment.

Take Measure O, in the City of Los Angeles, Clean Water, Ocean, River, Beach, Bay, Storm Water Cleanup Measure aka Proposition O—the promise for clean water. There was no planning. The bond was for \$500,000,000 and it is fully allocated. The capital costs vary so widely, your mouth drops open. There is no consistency or scientific measurement in place.

There has been only one report to the Mayor and City Council, while semi-annual ones are due. Projects will be audited periodically by the City Controller, which has not happened.

The project selection process was experimental. The science does not exist, therefore benefits are questionable and the use of the term multi-benefits means parks or land use.

Then the City wanted to place a measure on the ballot for parcel landowners, not citizen voters, to approve a parcel fee assessment to be used for operations and maintenance.

That was withdrawn when the citizen activists discovered the scheme.

The County of Los Angeles has been working on the same issue under Clean Water, Clean Beaches Initiative—a landowner based vote for fee assessment for operations and maintenance.

The Los Angeles Department of Water and Power LADWP recently lost a lawsuit, LA v. All Persons, regarding the transfer of water revenue into the General Fund. We understand that it is in appeal. Water revenue was to be used for water purposes or returned to the ratepayer.

IMPLEMENT A STATEWIDE WATER CONSERVATION PUBLIC INFORMATION AND OUTREACH CAMPAIGN

Think outside the box—use the seasons as a way to outreach.

In the summer, use sports,
In fall, use school and museums,
In winter, use cooking and the holidays,
In spring, use gardens and art.

PROVIDE ENFORCEMENT MECHANISMS FOR WATER CONSERVATION

“Require implementation of water conservation as a condition to receive state financial assistance.”

Expand this into housing state financial assistance, not just water suppliers.

“Take enforcement actions to prevent waste and unreasonable use of water.”

The Water Boards need a consumer friendly public forum. Landfills are not divorced from the boards, yet few people know that fact. They just do not know where to go outside their block.

“Provide additional enforcement tools for water suppliers”

Education is the cheapest way of enforcement.

INVESTIGATE POTENTIAL FLEXIBLE IMPLEMENTATION MEASURES

If this plan is one for a Cap and Trade Market, which is the intention of a Federal level, then watch the citizens rebel as they did so on Tuesday May 19, 2009 Election.

These financial schemes are destroying democracy. We want government out of our daily lives.

INCREASE THE USE OF RECYCLED WATER AND NON-TRADITIONAL SOURCES OF WATER

Outreach and educate. Make it socially desirable to use the methods.

Teach, not dictate.

PLAN IMPLEMENTATION, MONITORING, EVALUATION AND ADJUSTMENT

Use the science. Use links to universities and organizations that track data or to reports that apply. Make use of the websites, to inform and educate.

ANNUAL PROGRESS REPORTS

Create a Notification System to send out the reports to interested parties, community groups and organizations. Use the local contacts to develop strategies in problem areas of water conservation.

Let the media carry the message with open access.

Sometimes, people just do not know where to go.

IMPLEMENTATION BARRIERS AND RECOMMENDATIONS

Use IRWMP planning as an evolution into economic and land use planning and involve interested legislators to move that process forward.

It is not a time to create bureaucracy, but use existing bureaucracy more efficiently and diversely.

CONCLUSION

There is no conclusion, but a lifestyle change here. Let the individual take personal responsibility and grow into water conservation awareness.

This is example time; time to export the methods and successes to emerging countries.

Let us build back the economy together.

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