



# San Diego County Water Authority

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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  
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

## 20X2020 Agency Team

Department of Water Resources

1416 Ninth Street

P.O. Box 94236

Sacramento, CA 94236-001

**Subject: Comments on Draft 20X2020 Water Conservation Plan**

Dear 20X2020 Agency Team:

The San Diego County Water Authority believes that the Governor's call to reduce per capita water use statewide by 20 percent in 2020 is an achievable goal. The Water Authority and its member agencies have been pursuing aggressive water conservation measures for many years as active members of the California Urban Water Conservation Council. With the drought and the Governor's call for conservation, we will continue to support conservation programs. In recognition of the need for active statewide water conservation efforts, this letter is intended to provide constructive comments on the Draft 20 X 2020 Water Conservation Plan.

**The introduction should recognize that conservation efforts need to be focused on discretionary water use.** In the introduction it should be made clear that, due to limited water supplies in California, the failure to use water efficiently could have a detrimental impact on the economy. The primary focus in reducing water use needs to be on wasteful or discretionary water use. Cutting water that is used to support our economy, while allowing wasteful practices, is not the best use of resources.

**The plan should clarify that regional targets are not intended to apply to individual water agencies.** The plan states that the regional targets are for planning purposes only. This is consistent with statements made by State staff at the 20 X 2020 technical workshops. While we agree that approaches to setting targets and goals need to be addressed in statute, the plan offers no guidance on how this should be done. This could inadvertently lead one to believe that the regional targets should be set into statute and applied to individual water agencies. We recommend that the plan recognize that there are inherent differences between water agencies that need to be considered when establishing statutory requirements for setting conservation targets. These differences include local hydrology and weather patterns, land use patterns, beneficial uses of water within the agency's service area and past conservation efforts. The plan should then propose alternative methods that could be used by water supplier to set specific conservation targets based on reasonable use of water.

*A public agency providing a safe and reliable water supply to the San Diego region*

**The plan should recommend that the regional targets be reevaluated in 2015 based on more accurate data.** The preliminary regional targets were based on best available water use data, water savings due to code changes, historic best management practices (BMPs) for conservation programs and grant funded programs. As stated in the plan, the data used is not highly reliable. Therefore, the regional targets should be viewed as preliminary estimates and the Final Plan should contain a recommendation to revise the targets in 2015 based on the higher quality data that will be collected in the next five years.

**The plan for uniform data collection should be simple and collect only the data that is needed.** The Water Authority agrees with the 20 x 2020 Team that a uniform data collection and data management system is needed to obtain accurate information on water use and success in water conservation efforts. However, the plan fails to describe what data should be collected. The first step in determining how to manage data, is determining what data is really needed. Any data reporting system that is developed needs to be as simple as possible to minimize costs of collecting and maintaining data. Any data collection system should consider the reporting that is already done to the California Urban Water Conservation Council (CUWCC), through urban water management plans, and to the California Department of Public Health so that water agencies are not required to prepare yet another report to a state agency.

**The metering deadline should be accelerated.** The Water Authority supports metering of all customers in the state as soon as possible. While each agency should be responsible for their own meter installation, the state should consider financial incentives for submeters and for installation of "smart" meters to advance the ability to efficiently monitor water use and share that information with customers.

**The State should not mandate specific conservation measures.** Although the plan contains many good ideas on how agencies may achieve conservation, these methods or approaches should not become mandates. The Water Authority's member agencies are already implementing many of the recommendations called for in the plan including the landscape irrigation BMP, conservation pricing structures, conservation offsets, and water use restrictions. However, each of our member agencies is implementing these approaches in a different manner, because each agency has their own unique customer base. Decisions on how to achieve conservation at the local level are best left to local water agency governing boards. We recommend that methodologies be established to set individual agency targets and that individual agencies should then be responsible for meeting those targets with conservation measures that are best suited to their service areas.

**The State should not mandate a public goods charge.** Transplanting the public goods charge, into the public water agency universe is not a good fit. In Southern California water agencies have voluntarily made significant investments in water conservation funded by our own water rates and through Metropolitan Water District's stewardship fund. Local agencies are in the best position to determine how much conservation should be funded through financial incentives and rebate programs and how much conservation

should be encouraged through public outreach, rate structures and restrictions. We don't see a need for the State to step in and take over this role. Once a water supplier sets a conservation target, it should be left to the supplier to decide how to fund the water conservation programs. The Water Authority strongly requests that the public goods charge not be included as a recommendation in the Final Plan.

**The recommendation to reduce non-revenue water losses does not have a strong statistical basis.** The estimated non-revenue and water agency distribution system losses identified in the plan range from 2 gpcd to 21 gpcd. While these are identified as a high potential for water savings, it is not clear what the true potential is for recovering these losses. At this time, the focus should not be on recovering losses until better data can be collected using the American Waterworks Association water loss audit software.

**The plan should recommend a broad approach to achieving landscape conservation through market transformation.** The report recommends rebates to customers to convert landscapes, a state government lead on programs, and irrigation restrictions. The Water Authority is on track to achieve significant savings in the landscape sector through a comprehensive approach designed to achieve market transformation in the landscape sector. Our approach is a wide-ranging effort, which includes educating customers at the Water Authority's Water Conservation Garden, industry participation through the Conservation Action Committee, member agency and Water Authority outreach and education at the community level, and financial incentives. We have relied on:

- a. A focus on a change in the conservation ethic of customers. With a change in ethic, customers will be willing to improve their efficiency in watering, and upgrade to more drought tolerant landscapes.
- b. Active participation of the landscape industry. The entire supply chain for water efficient products and services must supply, support and encourage use of water efficient landscapes
- c. A change in customer perception of beauty. Customers put high value in the beauty of their landscapes. Customers need to be educated so they understand that water efficient landscapes can be beautiful.
- d. Educating users and industry on "how to" design, manage and modify landscapes to be more efficient by providing user guides and real life examples.
- e. Use of price signals to motivate customers to conserve
- f. Use of rebates to extent it helps motivate market transformation, and
- g. Encouraging local adoption and enforcement of the State's model landscape ordinance

**The plan should acknowledge the CUWCC's new BMPs as a framework for conservation in the future.** It is our understanding that the analysis in the report was based on the old BMPs because this was the best available information at the time the data analysis was completed. However, since that time there has been a complete update made to the CUWCC's BMPs through a vote of the membership. The current BMPs include a checklist approach and a flex track approach. At the June 2009 Plenary, the membership will vote on a third alternative which includes a target based approach. With the Council's flexible approach to conservation programs, we expect to see increased water conservation through cost effective programs. The report should, as a minimum, recognize and describe the new BMPs.

**The plan should include a vision of how to achieve greater conservation in the CII sector, while still supporting a strong economy.** There is discussion in the plan on the new CII technologies that were identified between 2004 and 2007, but no vision to the future of water conservation for the CII sector. Currently, there is a need to address efficient water use practices for industry. This can only be done with the active participation of business and industry. Identifying and encouraging efficient water use practices in the CII sector will protect business and industry by targeting water waste and avoiding cutbacks of process water which is critical for economic development.

We appreciate the opportunity to comment on the draft 20 X 2020 report and hope this information will be helpful to you as you move forward to finalize the report. If you have any questions regarding this letter, please contact Toby Roy at (858) 522-6743.

Sincerely,



Ken Weinberg  
Director of Water Resources