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**To:** <2020comments@waterboards.ca.gov>  
**Date:** 5/22/2009 4:48 PM  
**Subject:** 20 x 2020 comments from SSWD  
**Attachments:** 20 X 2020 Interagency Team Memo 5-22-09.pdf

Attached are SSWD's comments on the draft 20 x 2020 water conservation plan in .pdf format. Please do not hesitate to contact me if you have any questions or require any additional information.

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**Date:** May 22, 2009

**To:** 20 X 2020 Interagency Team

**From:** Robert S. Roscoe, General Manager  
Sacramento Suburban Water District (SSWD)

**Subject:** SSWD's Comments on Draft 20 X 2020 Water Conservation Plan

Thank you for the opportunity to provide comments on the proposed 20 x 2020 Water Conservation Plan. Sacramento Suburban Water District serves around 170,000 residents in north Sacramento County, and is a signatory to the historic Sacramento Water Forum Agreement which includes water conservation as one of the seven principal elements. SSWD supports the need for increased water conservation and water efficiency measures as part of an overall, comprehensive approach to solving the San Francisco – San Joaquin Delta crisis, and supports efficient water use as a key element in our District's Policy on Sustainability.

Unfortunately, the present draft is seriously flawed, wholly ignoring important principles in Delta protection, water-energy relationships, and regional self reliance as promoted by the state with integrated regional water management plans. Because of the terminal infirmities of the present approach, SSWD respectfully requests that the conservation planning efforts be started anew rather than trying to finalize the present draft with its flawed assumptions and approach. We offer the following comments on issues which must be addressed in future water conservation planning efforts:

1. Water conservation targets are quantity targets and must reflect net water removed from a watershed. In Hydrologic Region 5, roughly half of the M&I water removed from surface and groundwater sources in the watershed are returned to the watershed for subsequent use by the environment, and by agricultural and M&I users both within the Delta and in Delta export areas. Water agencies that export water from the Delta watershed and transfer it to areas unconnected to the Sacramento – San Joaquin River systems forever remove 100% of the resource from the Delta. Return flows must be included in the analysis as long as achieving comprehensive solutions to Delta issues are a goal. Water quality issues associated with return flows are presently and appropriately regulated in other venues. Water conservation is about quantity, particularly if it is focused solely on gallons per capita per day targets.
2. The present plan totally ignores AB32 and the well established relationship between water use and energy use. A huge percentage of the States total energy production

(and greenhouse gas emissions) is directly related to pumping water. The difference in carbon footprints for different supplies in different regions must be considered. Clearly there is a larger benefit to the state in reducing the amount of water that must be pumped 2,000 feet over a mountain range versus the same quantity of water that does not consume such significant energy resources. The present plan's total lack of consideration for the directly related impacts on energy consumption is an egregious omission that must be corrected.

3. The plan is based on very limited data with essentially no analysis of budget impacts. It would be a travesty to the public to adopt such a hastily developed, flawed plan that would drive potentially billions of dollars in expenditures of public funds, particularly at a time when the State is in such a financial crisis. Every dollar of public funds spent must be supported with thorough analysis backed by solid data. The present draft does not meet that benchmark.
4. The plan fails to properly consider regional differences in climate, land-use patterns, population densities, and landscape water requirements. Conservation targets that result are therefore patently inequitable and would result in drastic negative changes in social equity.
5. The plan appears to ignore conveyance losses associated with export systems that traverse hundreds of miles. Conservation principles that measure results at the residential meter without regard for the how much was actually removed from the watershed and evaporated on its way to the place of use ignore the true impact on the environment.
6. The draft plan leaves unmentioned, and indeed appears to attempt to circumvent, Water Code Section 1011, the right of a water supplier to retain the benefit of the conserved water. The principle of beneficiary pays must be a foundational element of the plan. The plan must identify who the beneficiaries of the conserved water are, and suggest an equitable mechanism to offset the enormous costs resulting from the proposed conservation efforts. As presently drafted, the plan appears to be a transparent attempt to reallocate water supplies and water rights external to the present water rights system in California.

SSWD remains committed to water use efficiency, resource sustainability and equitable use of the State's resources. We respectfully request that our comments be included in future efforts at drafting water conservation principles. In addition, SSWD has reviewed and endorses the comments submitted by the Regional Water Authority. We support the obvious need for additional conservation and water use efficiency, but believe that these efforts must: achieve

clearly stated goals, consider Delta impacts, consider energy impacts, be based on sound science, recognize the existing system of water rights, consider regional differences in climate and land use, be socially equitable, and achieve the maximum benefit for the costs involved. The present draft plan does not achieve these goals, and if implemented, would result in a tragic waste of public monies. Our comments are intended to be constructive, and we are ready and willing to do our part in achieving the State's 20 x 2020 goals.