

From: "Richard Jordan" <jordanjr@adelphia.net>
To: 2020Comments@waterboards.ca.gov
Date: Thu, May 21, 2009 9:22 PM
Subject: "20x2020 Draft Water Conservation Plan"

To whom it may concern:

Enclosed are my letters and attachments on the Draft.

Sincerely,
Mrs. Teresa Jordan

From: "Richard Jordan" <jordanjr@adelphia.net>
To: 2020Comments@waterboards.ca.gov
Date: Thu, May 21, 2009 9:30 PM
Subject: "20x2020 Draft Water Conservation Plan"

To whom it may concern:

Please be advised that my letters dated May 20, 2009 and May 21, 2009 were faxed to the Governor's 20x2020 Agency Team, @ 916_341_5620 on May 20th and May 21st respectively.

Sincerely,
Mrs. Teresa Jordan

3152 Shad Court
Simi Valley, CA 93063
May 11, 2009

City Council
VCWWD No. 8 Board of Directors
City Hall
2929 Tapo Canyon Road
Simi Valley, CA 93063

Re: Agenda Item 2C(A Public Hearing to Consider Adoption
of Ordinances Establishing a Water Conservation
Program in VCWWD No. 8 Service Area and the City).

Dear Members of the Council/Board:

It is unfortunate that this item was not agendized when 49 out of the 50 states were impacted by drought conditions of one sort or another at the same time just a few years ago. Most Californians have been living like there is no tomorrow with their water use because their government representatives have not been quick to implement water conservation programs, or to set the example. It would not have taken much to say "Look people this is what I am doing to cut back on my own use of water". I just hope that the Ordinances you approve do not lead to neighbors turning in neighbors in order to settle all types of scores.

Members of the Council/Board, since Governor Arnold Schwarzenegger has declared an emergency, does this action not in itself put all California cities and towns in an emergency condition, thus your constituents are actually facing at the most the implementation of the Level 1 water use requirements? If not, why not?

Members of the Council/Board, the staff report should have been accompanied by the District's Schedule of Service Charges for your constituents to realize the extent of the monetary fines should they not be in compliance of the regulations. It is not enough to state "then in effect" (Staff Report, Pages 24 and 25, Section (7)).

Members of the Council/Board, the staff report states on Page 21, Section (a) that public notification for shortage Levels 1, 2, and 3 will be done through publishing a copy

of the Board's declaration in a newspaper. This is not enough. Notification must also be done through: 1. modern technological tools (cell phones, computers, the City's Website, etceteras), 2. the water bills, 3. the Simi Valley Acorn, 4. the City information dedicated television channel, 5. printed materials in the Library, City Hall, the Environmental Services Department facility, the Senior Center, 6. printed materials in the Rancho Simi Recreation and Park District headquarters, 7. printed materials in the various social services' headquarters, 8. printed materials in the Simi Valley Unified School District's center and schools, and 9. printed materials in various businesses.

Members of the Council/Board, missing from the staff report and the Ordinances is a list of water saving tips for indoor use. Outdoor water use is unduly targeted. There must be specific requirements for hospitals, and medical clinics so that they can continue to provide preservation of life services.

Members of the Council/Board, it is stated in The Boeing Company's newly LARWQCB approved Tentative NPDES Permit, under Description of Waste Discharge, that the "SSFL has the potential...to discharge a total of approximately 168 million gallons per day (MDG) of storm water runoff..." Since potable water from the VCWWD No. 8 is used by the SSFL due to the 1970's agreement between the VCWWD No. 8 and Ventura County Waterworks District No. 17, do the SSFL's wastewater discharges qualify as "Actively irrigated environmental mitigation projects" (Page 20, Section (b)(vi))? Does the City have a list of these environmental mitigation projects--past, present, and future?

Members of the Council/Board, how did staff arrive at the 15 minutes of watering per day per station duration limit? Were 10 minutes considered by staff? Does the 15 minutes duration limit take fertilizing into consideration?

Members of the Council/Board, it is not enough to state that the water supply shortage "Levels" three and two watering days limits will be accomplished through "a schedule established and posted by VCWWD" (Staff Report, Pages 18 and 19). This emergency situation is unlike getting a high school or college subject schedule at the umpteenth hour. In order to avoid panicking constituents, this subject must go through the public participation process long before the "Levels" programs are implemented.

People need to know if the City is planning a schedule set by: 1. last name alphabetically, 2. tract neighborhoods, 3. Neighborhood Councils' areas, 4. lottery, and 5. etceteras.

Members of the Council/Board, what is the status of allowing the use of: 1. Astroturf in place of grass(long-term), 2. painting real grass "green"(short-term), 3. planted decorative greenery(artificial flowers and trees--the quality has improved considerably--(short-term)), and 4. desert environmental settings in front yards?

Members of the Council/Board, there is no requirement for a moratorium in swimming pool construction.

Members of the Council/Board, there is no requirement for a building moratorium.

Members of the Council/Board, there is no requirement for a decorative pond/decorative fountain moratorium.

Members of the Council/Board, there is no flexibility built into the Permanent Water Conservation Requirements' No Excessive Water Flow or Runoff section with regards to windy conditions which can reach up to 70 MPH some days. Such an oversight might be what leads to neighbor reporting neighbor situations.

Members of the Council/Board, it is stated in Section 6-11.110(Enforcement)(a), on Page 23, that "No customer of VCWWD shall make, cause, use, or permit the use of water in a manner contrary to any provision of this article. Each customer shall be guilty of a separate offense for each day during which such violation of this article occurred." A list of these types of prohibited uses must be available.

Members of the Council/Board, Section b. on Page 19 is incorrect. The correct Section is "(b)". Also, the text on Page 25 is exactly the same as that on Page 24.

Members of the Council/Board, have you been practicing outdoor water conservation to date? If not, why not?

Sincerely,

Teresa Jordan

3152 Shad Court
Simi Valley, CA 93063
May 13, 2009

DWR
Office of Water Use Efficiency
and Transfers
Attn: Gwen Huff
P.O. Box 942836
Sacramento, CA 94236-0001

Re: NOTICE OF 2ND 15-DAY COMMENT PERIOD FOR THE PROPOSED
MODIFICATIONS TO THE REGULATION MODEL WATER EFFICIENT
LANDSCAPE ORDINANCE TO CALIFORNIA CODE OF REGULATIONS,
TITLE 23 SECTIONS 490-495.

Dear Ms. Huff:

I just read the aforementioned notice and have read the modified text of proposed regulation. Though this subject is way out of my league as far as the mathematical and technical aspects, as a homeowner and as a concerned citizen I am addressing it from a layperson's perspective.

Ms. Huff, please note that on May 11, 2009, the City of Simi Valley City Council held a public hearing on the water use conservation ordinance. At the meeting, during the members discussions, the Mayor brought up revisiting the City's landscape requirements. Since the Ventura County Waterworks District No. 8 proposed ordinance involves penalties, and levels of water shortage conditions, I was surprised to hear that the City did not have a plan. Since I was helping out with my Mom, I didn't attend the meeting, but once home I watched the proceedings on the computer. I did submit a letter to the City Council. Enclosed is a copy of my May 11, 2009 letter(3 pages). DWR's modified model water efficient landscape ordinance is long overdue.

Ms. Huff, the following are my comments on the modified text for the model water efficient landscape ordinance.

#1 - Page 2, Section 490.1(a)(1), it is stated "...a landscape area equal to or greater than 2,500 square feet..." For over 17 years, anytime that

I have participated in residential and commercial development projects before the City of Simi Valley's Planning Commission, and City Council, I have only been privy to discussions involving percentages with regards to landscaped areas of 10%, 15%, and some as high as 20%. It would be helpful to the reader to know what 2,500 sq. ft. approximately translates into as a percentage.

- #2 - Page 3, Section 490.1(a)(2), it is stated "...a landscape area equal to or greater than 2,500 square feet..." Same comments as #1.
- #3 - Page 3, Section 490.1(a)(3), it is stated "...a total project landscape area equal to or greater than 5,000 square feet..." Same comments as #1.
- #4 - Page 3, Section 491, for consistency purposes, include "Definitions" in bold print.
- #5 - Page 4, Section 491.(t), is Astroturf considered a "durable material"?
- #6 - Page 6, Sections 491.(uu) and 491.(vv), reverse the order of "pervious"(uu), and "permit"(vv) to read (uu) "permit", and (vv) "pervious".
- #7 - Why are the words "groundwater", and "potable water" not included under the Definitions?
- #8 - Page 15, Section (d)(1), add a percentage column to the example chart.
- #9 - Page 33.13, APPENDIX A, under the column "County and City" add Fillmore, Moorpark, Ojai, Santa Paula, and Simi Valley. Please note that "Piru" is not one of the ten County of Ventura Cities-- Camarillo, Fillmore, Moorpark, Ojai, Oxnard, Port Hueneme, Santa Paula, Simi Valley, Thousand Oaks, Ventura(Buenaventura). Piru is a "community".

Sincerely,

Mrs. Teresa Jordan

3152 Shad Court
Simi Valley, CA 93063
May 20, 2009

Governor's 20X2020 Agency Team
John Moss Federal Building, 5th Floor
650 Capitol Mall
Sacramento, CA 95814

Re: The Draft "20X2020 Water Conservation Plan" Final
Report Public Review and Comments Period.

Dear Members of the Agency Team:

Since I have been addressing the Department of Water Resources(DWR)'s Draft 2009 Water Plan Update, I am setting that document aside in order to submitting comments on this critical subject. On further thought, my comments on the Draft Water Conservation Plan will come in handy addressing the Draft Water Plan Update's Volumes and Regional Reports. Though I found the Draft 20X2020 Water Conservation Plan to be an excellently compiled document, I was somewhat let down by the lack of consistency with regards to the pages' sequencing, and the subjects' titling. The Draft Water Conservation Plan is long overdue since as the statement on Page iii is nothing new "In California, water is precious ...and conservation is critical" since "The value that Californians place on water is reflected in a constitutional provision ensuring its reasonable and beneficial use. Article X, section 2 of the California Constitution prohibits the waste and unreasonable use of this precious resource...water conservation has always been important." Though, it has not always been carried out. And, now, we are faced with an EMERGENCY that will hit water rate customers in the pocketbook because no one wants to bite the bullet as far as really changing people's way of thinking and living(be they residents, businessmen/businesswomen, and politicians). The following are my comments on the Draft Water Conservation Plan.

NOTICE OF WORKSHOP

#1 - Page 1, under the WRITTEN COMMENTS section, it was extremely difficult to determine the proper

address to submit written comments. This was disappointing since the State Water Resources Control Board is one of the 20X2020 Agency Team members and the Board's public review and comment period notices include a specific address.

- #2 - Page 1, under WRITTEN COMMENTS section, the statement "All written comments must be received by 5:00 p.m. on May 22, 2009, and should be sent by email to: 2020comments@waterboards.ca.gov" does not allow for submittals through historical tools such as: 1. the mail, 2. by facsimile, and 3. through a messenger service for interested persons who cannot attend the workshop. Thus, valuable insights are lost.
- #3 - Page 2, the page was not numbered. This makes it difficult to refer to a page number for comments.
- #4 - Page 2, top of page, the statement "We strongly suggest that you visit the 20X2020 Agency Team Web site before the workshop to read the public comments in case you may wish to respond to comments by others during the workshop process" was a great and wonderful surprise. While the State Water Resources Control Board's Documents for Public Comment Website section lists the various submitted comments for visitors to read I have often thought about contacting commenters in order to ask questions, offer suggestions, or say thank you because comments were revealing.

APRIL 30, 2009 20X2020 WATER CONSERVATION PLAN DRAFT

- #1 - Cover Page, or Page i, under the "How to comment on the Draft 20x2020 Plan" section of the box, only an e-mail is given for "Submit written comments" "by May 22, 2009". All historical public comment submittal tools must be allowed for "interested parties" who cannot attend the workshop. Thus, valuable insights are not lost.
- #2 - Cover Page, or Page i, why is the 20x2020 Agency Team's website being "hosted" by the State Water Resources Control Board"?

- #3 - Page ii, or Blank Page, since Page 28 is blank and it includes the "20x2020 Water Conservation Plan DRAFT" title at the top of the page, include the title at the top of the page, and number the page. Make this page the "Acknowledgements" page. Include the information on the 20X2020 AGENCY TEAM MEMBERS that is found on the State Water Resources Control Board's Website 20x2020 "Contact List"(alphabetical names, and by agency names) section.
- #4 - Page iii, the "Preface" page, make this page the "Agency Acronyms" page. At the top of the page, include the title "20x2020 Water Conservation Plan DRAFT".
- #5 - Page iv, or Blank Page, make this page the "Preface" page, and number the page. At the top of the page, include the title "20x2020 Water Conservation Plan DRAFT".
- #6 - Page v, "Contents" page, at the top of the page, include the title "20x2020 Water Conservation Plan DRAFT". Include the "Acknowledgements" and "Agency Acronyms" subjects, and page numbers.
- #7 - Page vi, at the top of the page include "Contents" for consistency purposes.
- #8 - Page vii, at the top of the page, include the title "20x2020 Water Conservation Plan DRAFT" for consistency purposes.
- #9 - Page viii, or Blank Page, at the top of the page, include the title "20x2020 Water Conservation Plan DRAFT" for consistency purposes, and number the page.
- #10 - Page 48, or Blank Page, at the top of the page, include the title "20x2020 Water Conservation Plan DRAFT" for consistency purposes, and number the page.
- #11 - Page 7, change the heading title "20x2020 Planning Process" to "2. Planning Process".

- #12 - Pages ix, xi, 1, 3, 5, 7, 9, 11, 13, 15, 17, 19, 21, 23, 25, 27, 29, 31, 33, 35, 37, 39, 41, 43, 45, 47, 49, and 51, at the top of the pages, include the title "20x2020 Water Conservation Plan DRAFT" for consistency purposes.
- #13 - Pages x and xii, at the top of the pages, include "Executive Summary" for consistency purposes.
- #14 - Pages 2, 4, and 6, at the top of the pages, include "1. Introduction" for consistency purposes.
- #15 - Pages 7 through 10, at the top of the pages, change the heading title "20x2020 Planning Process" on Pages 7 and 9 to "2. Planning Process", and on Pages 8 and 10 include the heading title "2. Planning Process".
- #16 - Page 11, change the heading title to "3. Establishing a Baseline and Targets". At the top of the pages, change the "2" to "3" on pages 11, 13, 15, 17, 19, 21, 23, 25, and 27; and on pages 12, 14, 16, 18, 20, 22, 24, and 26, include the heading title "3. Establishing a Baseline and Targets".
- #17 - Page 29, change the heading title to "4. Recommendations". At the top of the pages, change the "3" to "4" on pages 29, 31, 33, 35, 37, 39, and 41; and on pages 30, 32, 34, 36, 38, 40, and 42 include the heading title "4. Recommendations".
- #18 - Page 43, change the heading title to "5. Implementation". At the top of the pages, change the "4" to "5" on pages 43 and 45; and include the heading title "5. Implementation" on pages 44 and 46.
- #19 - Page xi(Recommendations), number 6, with regards to the public information and outreach campaign, there must be better education of school kids when it comes to showering. Too many times, most especially girls, shower more than once a day, and showers exceed 20 minutes. Sometimes school boys do the same to cool off, etceteras.

Young adults(males and females) also do not grasp the importance of cutting back on water when showering. The same goes for many adults. With more voluntary conservation by the public the less legislating there has to be done.

- #20 - Page xi(Recommendations), number 9, if the increase in "non-traditional sources of water" involves the "tap-to-toilet" program, I am opposed to this concept.
- #21 - Page xi(Recommendations), number 3.b, the statement "Establish a state standard for water meter accuracy" was mind boggling.
- #22 - Page xi(Recommendations), number 1.d, I agree with the statement "Maintain existing programs and institutions".

Sincerely,

Mrs. Teresa Jordan

Enclosures:

- May 13, 2009, Letter to the DWR Office of Water Use Efficiency; Regulation Model Water Efficient Landscape Ordinance modifications. (2 Pages)
- May 11, 2009 Letter to the City of Simi Valley City Council/Board of Directors of the Ventura County Waterworks District No. 8; Establishing a Water Conservation Program/Approve Ordinances. (3 Pages)

3152 Shad Court
Simi Valley, CA 93063
May 21, 2009

Governor's 20X2020 Agency Team
John Moss Federal Building, 5th Floor
650 Capitol Hill
Sacramento, CA 95814

Re: The Draft "20X2020 Water Conservation Plan" Final
Report Public Review and Comments Period.

Dear Members of the Agency Team:

This letter is a follow-up to my May 20, 2009 letter on the aforementioned subject. Please note that in my May 20, 2009 letter, on Page 5, Comment #20 should have read "Page xi(Recommendations), number 9, if the increase in 'non-traditional sources of water' involves the 'toilet-to-tap' program, I am opposed to this concept." Sorry for any inconvenience this error may have caused.

APRIL 30, 2009 20X2020 WATER CONSERVATION PLAN DRAFT
(Continued)

#23 - Page 33, second paragraph, I was surprised to read that "Much of the data collected are unique to the needs of each agency or CUWCC, and the reporters of data(mainly water suppliers and water right holders) do not submit data to all agencies or CUWCC. Data submittal to some state agencies such as DWR is voluntary, while submittal to other state agencies such as DPH is mandated by law. Where there is overlap in data needs, common definitions and formats for submittal of data should be established." No wonder we have had a water crisis in California.

#24 - Page 33, second paragraph, I concur with the first three bullet points. As far as the "cost sharing and funding sources to facilitate development and maintenance of data management systems" is concerned, are these costs just within State agencies, or does this involve the

participation of CUWCC, or does this involve taxing Californians, or all of the above? Who would maintain the data management systems? Data must be maintained by the State to keep the information in the public's eye, not with an entity that may charge for copies. Also, by having the information maintained and kept in the possession of the State (agency, or agencies) hopefully there will not be the breach in information security as may be with a private entity.

- #25 - Page 36, top of page, I am opposed to moving the "state metering deadline from 2025 to 2020" due to the first bullet point's statement "Provide incentives such as access to additional grant funds for unmetered suppliers that complete metering before the deadline".
- #26 - Page 36, I concur with the recommendation to "Revise the water loss BMP to incorporate improved methodologies".
- #27 - Page 36, I have a concern with obtaining "authorization for state standards for high efficiency clothes washer" since this involves "residential clothes washers", and commercial coin-operated clothes washers". One of the ways that people for decades have been told can cut down on the use of water is by running full loads, and as far as commercial coin-operated clothes washers businesses are concerned has the Agency Team done a study as to how many companies will be impacted (manufacturer, and retailer, and the coin-operated businesses)?
- #28 - Page 37, I have a concern with accelerating "replacement of non-efficient toilets" since the first bullet point states "Replacement of inefficient fixtures upon resale (responsibility on property seller)", and the second bullet point states "Replacement of inefficient fixtures upon change of water service (responsibility on new water customer)". These two statements are also contradictory when the responsible party is a homeowner/homebuyer. This should be done on a volunteer basis, but

with a lot of educational emphasis. For decades homeowners and renters have been told to put a brick in the water tank, some folks skip flushing(urine only), etceteras in order to conserve. With regards to urinals, are these fixtures put in residential and rental units, or in hotels, motels, convention centers, etceteras?

- #29 - Page 39, I am concerned about the "public goods charge to provide stable funding for water management". Too often government and corporate America give pie-in-the-sky reasons, or gloom-and-doom scenarios in order to raid taxpayers/rate payers pocketbooks. So, I do not have any confidence in the statement "The Climate Action Plan proposes a public goods charge on water that can be collected on water bills and then used to fund end-use water efficiency improvements, system-wide efficiency projects, water recycling, and other actions that improve water and energy efficiency and reduce GHG emissions"(the second to last paragraph). Governments fritter away the money in order to fund pet projects, and corporate America embezzles, or mismanages the money, or uses it for salaries, and/or to keep their stakeholders happy. While it is stated that "a public goods charge could generate \$100 million to \$500 million annually" the fee schedule has not been identified.
- #30 - Page 44, I concur with the "Annual Progress Reports" recommendation. This item can also be handled in the same manner as is done with the local governments General Plan annual reports since the "regional IRWMPs" have not been set up up and down California.
- #31 - Page 42, I am concerned about implementing a cap-and-trade regime for water conservation". I have not been a supporter of the industrial air pollutant emissions cap-and-trade regime because the biggest polluters continue with the status quo. The same will occur with the biggest water dischargers since this regime is being proposed "within the context of integrated

regional water management". I don't mind flexibility, but I do mind when the status quo reigns supreme.

- #32 - Page 45, under Implementation Barriers and Recommendations, I was surprised to read that "At the local and regional levels, barriers include" "Competition for IRWM funds by proponents of water management strategies other than efficiency improvements"(second bullet point), "Inadequate communication and coordination between water suppliers, local governments, and land planning agencies"(fourth bullet point), and "Lack of understanding of the state's water challenges and their effect on the California economy and environment"(third bullet point). There is no excuse for the state level barriers because there have been years of abundance, but the bullet was not bitten in order to do the right thing by Californians.
- #33 - Page 2, under Plan Scale and Scope, second paragraph, second sentence, though it is stated "To achieve a reduction in overall water use while protecting the Delta's ecosystem, it is recognized that both urban and agricultural water use must be more efficient", the reality is that this will not be accomplished because on Page 3 it is stated "This *20x2020 Plan* does not address water losses in transmission of water between sources of supply and potable water treatment and distribution systems...`un-reported water` includes `large landscapes`(parks, golf courses, schools)) for which water deliveries may not be measured..."
- #34 - Page 3, "This *20x2020 Plan* recommends actions that will reduce per capita use, not total urban use, by 20 percent."
- #35 - Page 3, "This *20x2020 Plan* 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."

- #36 - Page 3, "This 20x2020 Plan 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."
"Desalination and use of recycled water to recharge aquifers or augment surface supplies are included among these new supply options."
"Municipal stormwater capture is also not included."
- #37 - Page 3, "This 20x2020 Plan addresses only potable water use."

Sincerely,

Mrs. Teresa Jordan