

Submitted by: Helen Ling, City of Livermore (10/15/13)

The City of Livermore Municipal Water utility submits the following comment regarding Agenda Item 3 of today's ITP meeting:

The ITP is recommending that the UWMP Act require urban water suppliers to fully account for the estimated savings of adopted codes, standards, ordinances, and land use plans. The reasoning provided is that "laws and regulations adopted by governmental bodies are likely to have a continuing and substantial impact on urban water use, and may influence future levels of water use as much or more than the active water efficiency programs conducted by the water supplier itself."

DWR's website states that "Urban Water Management Plans (UWMP) are prepared by California's urban water suppliers to support their long-term resource planning and ensure adequate water supplies are available to meet existing and future water demands." Governor Schwarzenegger in his 20x2020 Plan determined that for California to continue to have enough water support its growing population, it needs to reduce the amount of water each person uses per day (Per Capita Daily Consumption, which is measured in gallons per capita per day). This reduction of 20 percent per capita use by the year 2020 was supported by legislation passed in November 2009 (SBX7-7).

The objective of urban water management planning is to ensure adequate water supplies to meet existing and future water demands; the 20x2020 Plan calls for reducing per capita daily consumption. It is not readily apparent to us how separately delineating water savings based on adopted codes, standards, ordinances and land use plans from water savings resulting from the water supplier's active water efficiency programs supports/advances the UWMP Act objective and the 20x2020 goal. We do not support the ITP's recommendation on this matter as it would result in additional work for preparers of UWMPs for little resulting benefit.