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90<sup>th</sup> Anniversary  
1923 - 2013

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November 5, 2013

Department of Water Resources  
Division of Statewide Integrated Water Management  
Water Use and Efficiency Branch  
Attn: Peter Brostrom  
P.O. Box 942836  
Sacramento CA 94236-0001

### ***Re: Independent Technical Panel Demand Management Proposals***

Dear Mr. Brostrom:

Thank you for the opportunity to provide comments to the Independent Technical Panel (ITP) regarding the demand management measure (DMMs) proposals being considered at their meeting on November 5, 2013. As an urban water supplier, the Vista Irrigation District (District) is required to prepare an Urban Water Management Plan (UWMP) to insure its customers have a safe and reliable source of water. As part of that plan, the District required to be in compliance with the DMMs contained in the UWMP Act as well as the mandated per capita reduction in water use of 20 percent by 2020, as required by Senate Bill 7 of the Extraordinary Session (SBX 7-7).

We are concerned that many of the proposals under consideration do not insure or support the goals of providing a reliable water supply or reducing per capita water use. Additionally, it appears that some of the proposals do not fall within the scope of the ITP or meet the definition of DMMs as set forth in Assembly Bill 1420. Specific comments regarding proposals under consideration today are as follows:

- ***California Department of Water Resources (DWR) Review and Approval of UWMPs; Electronic Filing***  
DWR already provides extensive guidelines for preparation of UWMPs and conducts a review of the plans that are submitted. Agencies submit the plans as recommended by DWR. Therefore, there is no need to further specify criteria in law that is currently adequately addressed through DWR guidelines. Such a mandate would add significant new costs to DWR's operations without creating any new water savings or benefits for the state's water agencies or users.
- ***Tabulation of Service Area Landscape Ordinances***  
Tabulation of the details of local jurisdiction landscape ordinances is not relevant to water supply assessment since local ordinances should be at least as effective as the State Model Ordinance. Providing these details is time consuming for agencies preparing UWMPs. This work is better done on a statewide basis by conservation interest groups such as the California Urban Water Conservation Council or Alliance for Water Use Efficiency.

- ***Revised recommendation to Legislature to require distribution system water loss reporting in Urban Water Management Plans (UWMP)***  
Implementation of the water loss, leak detection and repair DMMs is included as part of DWR's proposal. There is no need to include the full resulting report in the UWMP.
- ***Inclusion of Energy Intensity and expanded Water System Description for large Urban Water Suppliers***  
Quantifying energy usage of supplies and using energy intensity as the criteria to determine the resources to meet future demands is not consistent with the intent of the UWMP Act because it refocuses the purpose of the UWMP away from ensuring adequate water supplies.
- ***Inclusion of Urban Water Supplier's "Avoided Cost of Water"***  
SBX 7-7 establishes targets for water conservation regardless of cost effectiveness. In aligning with SBX 7-7, avoided costs are no longer relevant to achieving the State's conservation goals. Agencies may choose to use avoided costs and cost effectiveness as a tool for assessing and selecting conservation programs, but this calculation should not be mandated in the UWMP.
- ***Projected Water Savings from Codes, Standards, Ordinances, and Transportation and Land Use Plans affecting an Urban Water Supplier's Service Area***  
While agencies should consider new codes and standards in developing their demand forecast, calculating what the water use would have been without the new codes and standards in order to determine passive savings is costly and time consuming. Such a mandate would add more costs that would be borne by ratepayers without providing any added assistance for water agencies in carrying out their long-term resource planning responsibilities to ensure adequate water supplies to meet existing and future demands for water.
- ***Simplified and Updated Reporting Requirements for Urban Water Management Planning Act Sections 10631(f) and (g)***  
Water agencies supported legislated conservation targets in an effort to provide accountability for achieving real conservation and to streamline regulatory oversight. In aligning with SBX 7-7, water agencies that are on track to meet their targets should be allowed to simplify the UWMP water use efficiency requirements in order to increase flexibility for conservation programs, while at the same time retain much needed accountability. For water agencies not meeting their targets, more structure is needed. The DWR straw proposal to update the DMMs is a reasonable approach. Including optional DMMs will encourage creative conservation approaches by water agencies.

We appreciate the hard work and time both that DWR and the members of the ITP have invested in this important task. We support the ITP's efforts to streamline and align the DMMs with the requirements of SBX 7-7. We urge the ITP to consider proven and effective DMMs to assist urban water suppliers in meeting their (as well as the Statewide) 20 percent by 2020 target. Thank you for your consideration of these comments.

Sincerely,



Roy A. Coox  
General Manager

