

Attachment to CUWA Letter to CALFED July 1, 1998
Specific Policy Comments On Water Use Efficiency

CALFED should support working with others to identify new opportunities for water use efficiency, including supporting new techniques and technology and finding ways to implement conservation measures that are cost-effective from a statewide perspective, not just a local perspective. CALFED should apply the same financial support criteria to both water conservation and water recycling. Where a recycling or conservation opportunity exists which may not be cost-effective for a local entity but would be on the basis of a state-wide cost-effectiveness test and CALFED deems production of that supply is required to meet Program objectives, supplemental state/federal funding should be made available to support the project to the level of state-wide cost effectiveness.

CUWA concurs with CALFED's general statewide assumptions that conservation will in most cases only offset increasing unmet demands, will usually result in "real" savings only where discharge is to a salt sink, that conserved water remains in the control of the conserver, and that conservation will, in most cases, not result in reduction in exports from the system except in years in which full demands in the export areas are already met. We also recognize and support that additional benefits such as water quality improvement due to improved return flow, reductions in diversion effects, and improvement of instream flow and timing may accrue under certain circumstances, leading to achievement of other CALFED objectives.

Page 1-5 Savings Estimates - On page 1-5 of the Water Use Efficiency technical appendix to the DEIS/EIR it is noted that DWR expects full implementation of urban BMPs. Urban purveyors have noted that full implementation of BMPs as described by DWR will depend upon local determinations of cost effectiveness and it is unlikely that all BMPs will be found cost-effective on a local level. Supplemental funding from CALFED will allow for implementation of BMPs not cost effective on a local level to meet an overall statewide level of cost-effectiveness or other CALFED objectives.

Page 2-1 Efficiency definition - CALFED has defined water use efficiency (p. 2-1) as those local management actions that increase the achievement of CALFED goals and objectives. CUWA supports this expansive definition beyond that simply of physical efficiency. However, it is important to underscore the cornerstone of each MOU. A local cost-effectiveness test is the driver for implementation of conservation actions or recycling programs. Where there is a statewide interest in pursuing conservation or recycling above the threshold of a local cost effectiveness test, statewide supplemental funding should be provided to effect such actions.

Page 2-14 Linkages; CUWA has concern regarding how linkages between progress on water use efficiency elements and other program components are developed as discussed on page 2-14. While it is acceptable to withhold action on a water supply component until a set of

assurances has been developed, once those assurances have been agreed, benefits (e.g., storage,) for agencies pursuing good faith efforts (certification) should not be withheld because of non-performance of others.

As appears on page 2-18 of the appendix, funding SWRCB review of conservation progress via fines collected is ripe for criticism and subject to abuse. It is inappropriate to have any enforcement program funded by the revenue it generates through fines.

Specific levels of funding need to be developed for supporting BMP implementation. Technical support for developing BMP plans and Ag management plans should be available to all agencies on a cost share basis. Supplemental funding for BMP implementation should be provided by CALFED to the marginal level of state-wide cost effectiveness where CALFED objectives are served.

Page 2-23 Assurances for Water Recycling - The document does not seem to indicate any proposals, perhaps by error of omission. Nonetheless, CUWA believes that review of Urban Water Management plans by DWR to verify inclusion of recycling elements prepared consistent with the CUWA/Watereuse Association guidebook is sufficient assurance that cost effective recycling will be done. Such a review must not second-guess the policy judgement of the local agency. It must only verify that the agency has a recycling element and that basic analytical techniques described in the guidebook were followed. CALFED funding should be made available to provide enough funds to ensure projects producing water that is cost-effective on a statewide basis or helps another CALFED objective but are not cost-effective on a local level are funded. CUWA opposes adding recycling as an urban BMP and California Urban Water Conservation Council review as this would be redundant to DWR's proposed review.



CALIFORNIA URBAN WATER AGENCIES

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