



96-190

71 Stevenson Street  
San Francisco, CA 94105  
415 777-0220  
Fax 415 495-5996

## Memorandum

JUN 18 1996

**To:** CALFED Program Staff

**From:** Ronnie Weiner, NRDC  
Roberta Borgonovo, League of Women Voters  
David Czamanske, Sierra Club  
Tom Panella, Planning and Conservation League  
Cynthia Koehler, NHI

**Date:** June 13, 1996

**Re:** Urban Water Conservation

---

The environmental community has been a long-time participant in and supporter of the California Urban Water Conservation Council (the Council) and the Memorandum of Understanding Regarding Urban Water Conservation in California (MOU). All of the above listed organizations serve on the steering committee for the Council. Unfortunately, we must correct some of the information presented by California Urban Water Agencies (CUWA) in their comments on the CALFED alternatives with regard to urban water conservation and the efficacy of the Council in achieving the goals of the MOU. In particular, we disagree with the assertion that "all CUWA member agencies currently comply with all 16 BMPs listed in the MOU." While we recognize that many urban agencies have made significant and admirable progress in implementing the BMPs, most have fallen far short of the levels of conservation to which they have committed by signing the MOU.

The clearest evidence that many of the urban agencies are not meeting their BMP commitments can be seen by reviewing implementation of BMP 16, Ultra Low-Flush Toilet (ULFT) Replacement. The BMP requires agencies to retrofit as many toilets as would be replaced if the jurisdiction had a law requiring toilets to be replaced with ULFTs upon home resale. Thus, if we know the rate of residential turnover, we can roughly calculate the number of toilets which must be replaced to comply with this BMP. The table on the following page assumes 1.4 toilets per household and a 4% turnover rate (fairly conservative). The required number of retrofits necessary to comply with the BMP is then compared with actual data on toilet retrofits in 1995.

As the table clearly indicates, many of the CUWA agencies are not even achieving 50% of the performance standard for this BMP. And while MWD and LADWP are to be commended for achieving and surpassing the performance standard for BMP #16, the record of most of the Northern California agencies is far weaker, with the City of San Francisco at a mere 5% of its commitment.

100% Post-Consumer  
Recycled

40 West 20th Street  
New York, New York 10011  
212 727-2700  
Fax 212 727-1773

1350 New York Ave., N.W.  
Washington, DC 20005  
202 783-7800  
Fax 202 783-5917

6310 San Vicente Blvd., Suite 250  
Los Angeles, CA 90048  
213 934-6900  
Fax 213 934-1210

1

E - 0 1 3 1 9 3

E-013193

Clearly, the Council as currently operated cannot ensure adequate compliance with the MOU. We believe that additional enforcement measures are required in order to ensure that urban demand-side management reaches its potential as a part of the Bay-Delta solution. We believe that it is possible to develop enforcement mechanisms that will improve compliance with BMPs while retaining the cost-effectiveness testing and sensitivity to local conditions which have been key to urban support of the MOU.

Also, as noted in the EWC scoping comments submitted to CALFED, we believe that significant additional urban water conservation beyond full implementation of the BMPs is possible, particularly by targeting outdoor landscaping and household appliance standards.

We look forward to working with CALFED, members of the Council, and other stakeholders to develop implementation methods that will continue to advance urban water conservation while retaining sensitivity to issues of local control. Relying entirely on the existing structure, however, is unacceptable.

**BMP #16 Compliance Rates - 1995**

Agency	People per household	Population (thousands)	ULFT retrofits required BMP 16	Actual installations of ULFTs in 1995	Compliance ratio
ACWD	3.09	286	5,183	1,000	19%
CCWD	2.66	400	8,421	2,570	30.5%
EBMUD	2.4	1,200	28,000	7,600	27%
SFPUC	2.66	2,300	48,421	2,569	5%
SCVWD	2.5 <sup>1</sup>	2,800	62,720	45,000	72%
MWDSC	3.02	15,700	291,126	299,000	102%
LADWP	2.91	3,600	69,278	107,000	154%
MWDOC	2.95	2,600	49,356	32,000	65%
SDCWA	2.78	2,600	52,374	33,000	63%
SDWUD	2.94	1,200	22,857	Not available	Not available

<sup>1</sup> Assumed number of persons per household.

cc: Byron Buck