



## CUWA Positions on the State's Development of a Long-Term Water Use Efficiency Framework

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CUWA's mission is to provide a forum for combining the expertise and resources of its member agencies to advance reliable, high-quality water supplies for California's current and future urban water needs in a cost-effective manner for the public, the environment, and the economy. Water use efficiency is a fundamental component of this mission and an expanding part of CUWA member agencies' long-term water supply reliability efforts for meeting future water demands.

The following points reflect CUWA's current positions on the state's development of a long-term water use efficiency framework, in response to Governor Brown's Executive Order (EO) B-37-16.

**1. CUWA is committed to building on the recent gains in public understanding to establish a cultural shift toward water use efficiency as a California way of life.**

Our member agencies are committed to making efficient water use a California way of life and providing reliable, resilient water supplies now and in the future. Our agencies' water use efficiency programs have focused on creating lasting changes and developing effective tools that we continue to apply.

Recent reporting efforts and performance measures have improved awareness and visibility—increasing the media's and the public's consciousness of water use and leading customers to largely embrace and implement conservation measures during the drought. Our agencies are committed to continued water use efficiency, whether or not mandated by the state.

**2. The state should recognize CUWA as a key partner in developing the long-term water use efficiency framework, as a representative of the water agencies serving 70 percent of California's population.**

While CUWA appreciates that the state's stakeholder effort (the Urban Advisory Group formed in response to EO B-37-16) is open to the public, the CUWA agencies are responsible for implementing outcomes of the framework and achieving water use efficiency for the majority of the state's population. CUWA's appropriate role is more as a critical partner to the state in developing the framework.

**3. The framework should acknowledge and distinguish the respective roles of state agencies, including the California Department of Water Resources (DWR) and State Water Resources Control Board (State Board).**

DWR is the state's water resource management agency responsible for planning and implementing statewide efficiency and drought preparedness programs, while the State Board is responsible for regulatory enforcement and compliance. The roles of DWR and the State Board in the long-term water use efficiency framework should remain consistent with their responsibilities. The Sustainable Groundwater Management Act (SGMA) is a working example of the complementary roles and responsibilities of the two agencies.

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**4. An iterative and flexible approach is critical in the design and implementation of the long-term water use efficiency framework.**

The long-term water use efficiency framework should provide a broad policy outline on the approach to calculating the new water use targets. The broad policies should provide for a single, agency-wide target and use irrigable instead of irrigated acres in calculating landscape area. The state should then allow sufficient time to pilot test proposed target-setting methodology with agencies and incorporate needed refinements through an iterative process to understand the impacts and optimize the outcomes. Once long-term water use targets are established, water agencies should be provided sufficient time to evaluate the targets, and water agencies need full flexibility for implementing local and/or regional programs to meet their targets. Customers' water rates will increase to address costs of implementing programs to result in lasting water use reductions and meet the new targets. To lessen the impact on customers (particularly those in disadvantaged communities), water agencies need adequate time to fully achieve the target (2030 with interim milestones) to allow for incremental rate increases.

**5. Actions appropriate for sustainable long-term water use efficiency differ significantly from those for short-term, emergency water use reductions.**

Actions taken to address water shortage emergencies are intended to achieve short-term water use reductions, which are unsustainable and can result in adverse unintended consequences. When properly designed and implemented, long-term water use efficiency programs result in sustainable potable demand offsets that support the economy, environment, and communities.

**6. Water use efficiency is an important component of comprehensive water management and one element of a diverse portfolio of sustainable water supplies.**

While water use efficiency is an important element of future water supply, it is not in itself sufficient to manage all future water demands. Greater flexibility, enabled by more diverse supply and storage options, will better position urban utilities to address future uncertainties. The California Water Action Plan acknowledges the need for more comprehensive water management and supports "making regions more self-reliant by reducing water demand and by developing new or underused water resources locally" and expanding storage "to deal with the effects of drought and climate change on water supplies for both human and ecosystem needs."

**7. The state should consider and address potential unintended consequences of long-term water use reductions when establishing the methodology for new water use efficiency targets.**

Long-term water use reductions may result in a broad range of unintended consequences. Potential consequences to the environment include loss of mature trees in urban areas and urban/suburban wildlife habitat, heat island effects, stormwater quality impacts, and/or reduced groundwater recharge. Other consequences may include adverse impacts to the California economy (i.e., reduced process water for commercial/industrial products and associated workforce reduction), reduced wastewater flows (i.e., increased conveyance system clogging and/or high-flow flushing to move debris and sediment), reduced property values, and compromised quality of life. Furthermore, the cost of implementing programs to meet new water use targets and potentially to mitigate other unintended consequences will increase customers' water rates, further exacerbating affordability issues in urban disadvantaged communities. It is critical that the state carefully consider and address these potential unintended consequences when developing water use target methodology.

**8. Water Shortage Contingency Plan requirements should incorporate a statistical and scientific basis and reflect agency-specific characteristics.**

Water Shortage Contingency Plans (WSCPs) should include a probable shortage analysis using a methodology equivalent to a water supplier's five consecutive historic driest years, which is

established from historical records. WSCP requirements should enable flexibility to incorporate analyses and actions suited to agency-specific characteristics.

**9. The long-term water use efficiency framework must not adversely result in implied or inferred impacts to water rights.**

Water rights are important for supporting the California economy and accommodating population increases and should not be compromised as a result of implementing the long-term water use efficiency framework.

**10. Long-term water use efficiency progress is most appropriately evaluated using long-term trends.**

Evaluating long-term water use trends helps to buffer short-term fluctuations due to drought rebound, economy, and weather and provides a more accurate indication of progress. This approach is currently reflected in the SBx7-7 process with compliance points overlapping with Urban Water Management Plans (UWMPs) in five-year increments. Though EO B-37-16 calls for permanent monthly reporting of water use and conservation, the state should evaluate compliance with long-term targets through longer-term planning efforts such as UWMPs, and not on a monthly basis.