

From: "Church, Jolene" <JChurch@riversideca.gov>
To: 2020Comments@waterboards.ca.gov
Date: Fri, May 22, 2009 12:04 PM
Subject: 20x2020 Comments Proposed Final Draft Implementation 20x2020
Plan for Urban Water Conservation

20x2020 AGENCY TEAM

C/O CALIFORNIA DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836

SACRAMENTO, CA 94236-0001

2020COMMENTS@,WATERBOARDS.CA.GOV

SUBJECT: PROPOSED FINAL DRAFT IMPLEMENTATION 20x2020 PLAN

FOR URBAN WATER CONSERVATION

The City of Riverside Public Utilities (RPU) appreciates the opportunity to submit comments on

the Agency Team's Proposed Final Draft 20x2020 Water Conservation Plan.

RPU supports the Governor's statewide goal to reduce per capita water use 20 percent by 2020.

RPU Board of Director's Water Committee recently endorsed and directed RPU staff to

implement plans to reach that specific goal within our service territory. Although we support

some of the proposals identified in the 20x2020 Plan, many significant policy issues remain to be

resolved and RPU opposes any effort by the 20x2020 Agency Team to finalize they document

and submit it to the Governor at this time.

The Association of California Water Agencies (ACWA) has submitted extensive comments on the

Plan and those comments are incorporated herein by reference.

(Please see attachment)

Jolene Church

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SIGNIFICANT POLICY ISSUES OF CONCERN TO RPU

1. Use of Hydrologic Zones

The use of DWR hydrologic zones to determine baselines and reduction targets is particularly troubling to RPU. RPU's service territory sits in the semi-arid desert transition, on the border between the South Coast and Colorado River hydrologic zones. Under the present proposal RPU's baseline would fall under the coastal zone where present per capita water use is far lower than RPU's per capita use. Use of ET zones for the purpose of baseline and targets is a more appropriate methodology.

2. Comprehensive Solution

Water conservation is only one part of necessary strategies and solutions to meet California's water supply needs. The 20x2020 plan does not make this point clear.

3. Local Control

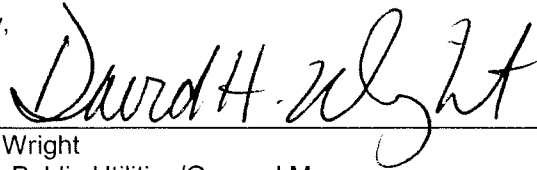
RPU has consistently delivered solutions to our requirements in a timely and cost effective manner. RPU's recent activities and projects have eliminated our dependence on State Project and other imported sources and made available new supplies to neighboring agencies that are 100% dependent on imported supplies. These projects happened through local decision making based on local needs and economics, not top down directives.

4. Public Goods Charge for Water

This proposal is not acceptable to Riverside Public Utilities.

Riverside Public Utilities is prepared to work locally and regionally to implement an effective plan to reduce consumption and improve water supply reliability. We ask that the 20x2020 Agency Team avoid finalizing the 20x2020 Plan until it can receive widespread support from water agencies statewide.

Sincerely,



David H. Wright
Riverside Public Utilities/General Manager



Robert Stockton
Chair/ Board of Public Utilities

CC:

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