



June 4, 2021

WUEStandards@water.ca.gov

Water Use Efficiency Branch
Department of Water Resources
P.O. Box 942836
1416 9th St, Sacramento, CA 95814

Sean Bigley, Chair
Dan York, Vice Chair

Re: Indoor Residential Water Use Study (IRWUS) REPORT COMMENT LETTER

Members

California American Water
Carmichael Water District
Citrus Heights Water District
Del Paso Manor Water District
El Dorado Irrigation District
Elk Grove Water District
Fair Oaks Water District
Folsom, City of
Golden State Water Company
Lincoln, City of
Orange Vale Water Company
Placer County Water Agency
Rancho Murieta Community Services District
Roseville, City of
Sacramento, City of
Sacramento County Water Agency
Sacramento Suburban Water District
San Juan Water District
West Sacramento, City of
Yuba City, City of

Dear Water Use Efficiency Branch,

Summary

The Regional Water Authority (RWA) urges the Department to conduct a more thorough evaluation of the impacts the proposed recommended standards in the IRWUS draft report regarding the ability for water suppliers to achieve the human right to water. It is our belief that the achievement of the human right to water is the essential function for which water agencies were originally established. We further believe that statewide policies put forth should advance the ability to achieve the human right to water and to do so must put climate resilience first. We are concerned that the proposed recommended standards would result in the diversion of investments from the best climate resilience and the lowest cost option to improve water reliability in the Sacramento Region, thereby increasing costs and exacerbating the challenges to the continued achievement of the human right to water.

- Regional conjunctive use is the least cost water reliability alternative in our region. A new acre-foot of water from conjunctive use in the region costs approximately \$250. Additionally, conjunctive use improves water management in all year types, both wet and dry, and as a result holds great ability to adapt to the longer dryer warmer droughts and shorter less frequent but more intense storm events we know are intensifying with climate change and it does this while improving environmental conditions.
- We are committed to water use efficiency. It is necessary for climate adaption, but the costs of gaining a new acre-foot of savings from indoor water use efficiency are rising and the next increment of indoor water use efficiency measures will cost approximately \$400 per acre foot or more. Our twenty-year experience in advancing water use efficiency has shown us that much of the lowest cost savings measures from indoor water use efficiency have already been implemented. This is captured by the fact that we have experienced a 57 percent decrease in indoor rebate applications over the last 10 years despite more funding being available.

Associates

County of Placer
El Dorado County Water Agency
Sacramento Area Flood Control Agency
Sacramento Municipal Utility District
Sacramento Regional County Sanitation District

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Dear Water Use Efficiency Branch

- Eighty-Five percent of the cost of water delivery is borne by local rate payers. A policy that “accelerate(s) water conservation will cost money¹” will likely exacerbate this cost share. Unfortunately, this poses a significant challenge to affordability in the human right to water.

The draft report states that regulations have the potential to conflict². The draft report further states that recommendations in the draft report will cost money and those potential economic impacts were not analyzed³. The totality of these three statements leaves us extremely concerned that the recommendations in the draft report will make it harder to adapt to the impacts of climate change and hinder the continued and expanded achievement of the human right to water in the region.

Specific tradeoffs in the Sacramento Region

California water delivery has been described as a “system of systems.” This basic fact poses a significant challenge to any effort that seeks to establish a single indoor water use efficiency standard statewide. It poses a particular challenge when trying to find the lowest cost path and promoting the achievement of the human right to water at the community level.

The draft report states:

“water use efficiency is often less expensive than developing new water supplies and may help to ensure equitable and affordable access to water.⁴”

Unfortunately, this statement is not supported by the experience in the Sacramento Region.

RWA has a twenty-year history of implementing and promoting water use efficiency. We are unequivocally committed to advancing water use efficiency. It is a core element of the Water Forum agreement, a local agreement between a diverse group of business and agricultural leaders, citizen groups, environmentalists, water managers and local

¹ Draft IRWUS report section 7.4 Unknown effect on affordability of water and Human Right to water, Page 78

² “Often, these regulations are developed in parallel with each other with separately defined goals, and **they have the potential to conflict** “ Appendix I 1.3.2 Interconnections with Other Regulatory Actions, page I-ES-6

³ “The studies did not analyze potential economic impacts.” Draft IRWUS report section 7.4 Unknown effect on affordability of water and Human Right to water, Page 78

⁴ Draft IRWUS report section 7.4 Unknown effect on affordability of water and Human Right to water, Page 78

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governments. The Water Forum is based on achieving the two co-equal objectives of water supply and environmental health.

RWA has extensive real-world, nationally recognized experience with implementation of water use efficiency in our community. We understand the challenges that we face for continued improvements in our community. We know that the lowest cost water efficiency measures have largely been implemented in the region. This is exemplified by the fact that we have experienced a 57 percent decrease in indoor rebate applications over the last 10 years, despite the availability of more funding.

Our experience tells us that much of the future work on indoor water use efficiency will require direct installation of efficient appliances and fixtures. The costs of direct installation programs are 3-5 times higher than prior indoor efficiency measures, like rebates, for the same level of savings. We expect that the next increment of indoor water use efficiency measures in the region needed to meet the recommended indoor standard will cost approximately \$400 an acre-foot.

As the integrated region water management planning entity in the region, RWA has identified a regional conjunctive use program as necessary to adapt to climate change and maintain reliability. The next increment of implementing conjunctive use in the region will cost approximately \$250 an acre-foot. Conjunctive use will allow for improved environmental management. Additionally, implementation of conjunctive use does not face the same adverse impacts identified in the draft IRWUS report.

Lastly, the vast majority of the costs for water delivery are borne at the local level. When the draft report states that implementation of the recommendations “will cost money,” traditionally those costs are directly passed down to local rate payers. The report should identify how state funding will be made available to implement its recommendations to mitigate this concern. This is particularly important because increased costs that are passed down disproportionately impact the lowest income rate payers.

Conclusion

We believe that RWA and the state have a shared top-level priority to develop a 21st century water system that is resilient to climate change and meets both human and environmental needs consistent with the human right to water. We do not believe that the proposed recommendations in the draft IRWUS report are advancing that top-level priority in the Sacramento Region. We

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further believe that statewide policy must advance the lowest cost greatest benefit approaches to adapt to climate change and advance the human right to water. This will require flexibility, collaboration, and reciprocal understanding. We stand ready to work with the state to develop a policy that comprehensively improves climate resilience and advances the human right to water.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Peifer". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Jim Peifer
Executive Director