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METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA


 EXECUTIVE SECRETARY

October 18, 1994

To: Board of Directors (Water Problems Committee--Information)

From: General Manager

Subject: Water Resources Element for Metropolitan Water District
 Service Area for the Regional Comprehensive Plan of Southern
 California Association of Governments

Report

Metropolitan's water supply and facility plans are based on adopted Growth Management Plans of the Southern California Association of Governments (SCAG) and the San Diego Association of Governments (SANDAG). This procedure ensures that Metropolitan's water plans are consistent with regional and community goals for land use, infrastructure development, and resource protection.

At the December 1992 Board meeting, staff reported that SCAG had asked Metropolitan to formally participate in the Regional Comprehensive Plan (RCP) effort by preparing the Water Resources Element for Metropolitan's service area. At the October 1993 Board meeting, staff presented to you the Draft Water Resources Element for Metropolitan's service area. The Draft Water Resources Element was incorporated into the Water Resources Chapter of SCAG's Draft RCP and released for public comments in December 1993. SCAG also prepared and released the Draft Environmental Impact Report for the RCP for public comments in December 1993.

SCAG's RCP is composed of 16 chapters which are divided into three categories: core, ancillary, and "bridge" chapters. The core chapters, including Growth Management, Regional Mobility, Air Quality, Water Quality and Hazardous Waste, were prepared under SCAG's mandated authority with respect to federal and state requirements. The ancillary chapters, including the Economy, Housing, Human Resources, Water Resources, Energy, Open Space and Conservation, Finance, and Integrated Solid Waste, were prepared by SCAG in cooperation with other agencies, such as Metropolitan, the Energy Commission, and the Bureau of Land Management. These ancillary chapters will serve as non-binding, voluntary policy guidance documents for local

governments and the private and non-profit sectors in Southern California. The Introduction, Strategy, and Implementation chapters of the RCP are bridge chapters showing links between the requirements of the core chapters and the guidance for other areas of concern expressed in the ancillary chapters.

SCAG has adopted the Growth Management, Regional Mobility and Air Quality core chapters and certified the Final Environmental Impact Report for the RCP in June 1994. In the last several months, committees of SCAG have been reviewing, receiving public comments, and adopting the remaining chapters of the RCP.

After reviewing the comments received on the Water Resources chapter, staff has prepared the attached responses to comments pertaining to the Metropolitan service area and finalized the Water Resources Element for Metropolitan service area. The Water Resources chapter will be presented to the Energy and Environment Committee of SCAG in November 1994. The chapter will then be presented to the Standing Committee of Planning and the Regional Council of SCAG for adoption in December 1994.

Background

Metropolitan forecasts water demands, and the need for water supply and facilities based on Growth Management Plans adopted by SCAG and SANDAG. The Growth Management Plans represent the collective efforts of cities and counties to agree on a common future direction for growth and development. In 1991, SCAG expanded the traditional Growth Management Plan effort to a broader RCP for its six-county (Los Angeles, Imperial, Orange, Riverside, San Bernardino, and Ventura) region. In 1992, AB 455 was enacted to encourage coordination and consultation between water supply and land use approval agencies to ensure proper water supply planning to accommodate planned development. In January 1993, Metropolitan entered into a Memorandum of Understanding with SCAG to prepare a water resources element for Metropolitan service area for SCAG's 1993 RCP.

Objectives and Contents of the Water Resources Element

The objectives of the Water Resources Element for Metropolitan's service area are: (1) to clarify the relationship between the Water Resources Element for Metropolitan's service area and the SCAG RCP; (2) to provide an assessment of regional water demands based on SCAG's growth forecasts; (3) to provide an assessment of current

and projected water supplies; (4) to provide a description of programs that will meet the requirements of a reliable urban water supply for Metropolitan's service area and appropriate mitigation measures for the SCAG Environmental Impact Report on the RCP; and (5) to identify issues for resolution in the next RCP update.


The Water Resources Element is patterned after the 1990 Urban Water Management Plan with updated information on water supply and demand projections. The Water Resources Element also references the on-going Integrated Resources Planning process of Metropolitan and its member agencies.

Recommendation

For information only.

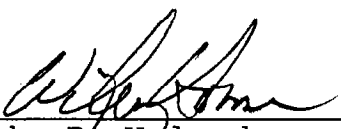
John R. Wodraska
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Submitted by:



Debra C. Man
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Concur:



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GC:bc

Attachment

**Metropolitan Water District's
Response to Comments on Water Resources Chapter
of SCAG's Regional Comprehensive Plan**

Comments and Responses • Water Resources

Source	Comment	Response
Arroyo Verdugo Sub region Policy Group, City of Glendale, and the City of La Canada Flintridge	<ol style="list-style-type: none"> 1. Public education on the use of reclaimed water may help remove any stigma attached to its use. 2. Integration of Water Resources issues with total of RCP is not fully realized. 3. Localized sources of ground water are not fully developed, contrary to RCP. 4. Emphasize conjunctive use of water 	Comments 1-4 noted.
South Bay Cities Association	<ol style="list-style-type: none"> 1. South Bay Cities Association's prime interest in the Water Resources and Water Quality sections is to ensure a viable, long-term water supply for the South Coast. 2. The Association is supportive of the RCP's position in: (i) recognizing that maintaining water quality is important to the economic viability of the region; (ii) addressing the availability of water as both a quality of life issue and an economic development issue; and (iii) addressing the need to serve projected growth. 	Comments 1-2 noted.

Source	Comment	Response
City of Imperial	<ol style="list-style-type: none"> 1. It has been noted that Metropolitan Water District (MWD) wrote the Water Resources chapter. How much input did the Imperial Irrigation District have on the document? 	<ol style="list-style-type: none"> 1. MWD only prepared the Water Resources component pertaining to its service area and is included as Sections B through F of Chapter Ten of the RCP. SCAG and MWD organized a technical review group to assist in the preparation and review of the description of its water resources plan for the RCP. Local government representatives and water agencies within and outside of MWD's service area were invited to participate in the technical review group. Also, as noted on page 10-2 of the RCP, SCAG surveyed water agencies outside MWD's service area to obtain information on water supply and demand projections. The survey results, including the response from Imperial Irrigation District are listed in Section G
City of Torrance	<ol style="list-style-type: none"> 1. The basic goal of the MWD and its affiliated agencies as presented in the RCP is to provide reliable water supplies to meet future demand at reasonable costs. 2. The MWD recognizes that attaining this goal will involve utilizing a mixture of resources. 3. The City supports using the Integrated Resources Planning (IRP) process to develop efficient and reliable resource supply plans, and pursue local water resources, water reclamation and water conservation to augment water supply. 4. The City recommends that local jurisdictions continue pursuing water conservation measures including education and public information programs, and water management measures. 	Comments 1-4 noted

Source	Comment	Response
City of Vernon	<ol style="list-style-type: none"> It deserves mention that Chapter 10, Water Resources, contains the longest and most detailed discussion of any chapter in the RCP. 	<ol style="list-style-type: none"> Comment noted.
City of Los Angeles, Office of Reclamation	<ol style="list-style-type: none"> The Office of Water Reclamation supports the use of reclaimed water to provide a vital supply of reliable and local water in the region. The potential for using reclaimed water in the region is great. The RCP discussion of potential reuse was based upon an outdated study, Water Recycling 2000. The WateReuse Association of California, Future Water Recycling Potential, July 1993, reveals a potential of 998,000 acre-feet per year by 2010 in the MWD service area comprised of Regional Water Quality Control Board Regions 4, 7, 8 and 9. This figure is considerably higher than the 675,000 AFY cited by SCAG. Funding should not be considered the number one barrier to the use of reclaimed water. The public accepts the use of reclaimed water. Where public opinion becomes negative is when appropriate information on the safe use of reclaimed water has not been disseminated or is incorrect. The major stumbling block to increased use of reclaimed water is the lack of political will in some local governments to implement a water reclamation agenda. 	<ol style="list-style-type: none"> SCAG and MWD agree with comments 1, 5, 6 and 7. The RCP discussion referenced Water Recycling 2000 on some of the key factors identified as issues that need to be addressed to further increase the use of reclaimed water. The projected amount of reclaimed water, however, was based on plans of various local water agencies within MWD's service area instead of the survey results of Water Recycling 2000. MWD and its member agencies are currently engaged in the IRP process. The primary objective of the IRP process is to develop efficient and reliable water supply plans utilizing mixes of local and imported resources as well as demand management options. The optimal level of reclaimed water development will be assessed through the IRP process. There are several differences in the projections used by MWD and those cited in the WateReuse Association survey. Firstly, MWD's service area encompasses only portions of Regions 4, 7, 8 and 9. Secondly, the projections used in the RCP represent the amount of potable supply that will be replaced by the use of reclaimed water. Therefore, the RCP projections do not included reclaimed water developed for environmental enhancements and projects that would create its own demand for reclaimed water such as recreational lakes or aqua culture. The WateReuse survey presents the potential for all uses of reclaimed water. Local agencies have continued to indicate that funding is the number one barrier to reclaimed water development.

Source	Comment	Response
	<p>7. The Office of Water Reclamation strongly recommends that SCAG adopt an aggressive program to promote the use of reclaimed water for the many important non potable and indirect potable demands.</p>	<p>Financing water reuse projects is especially challenging at the present time due to the limitation of local revenue caused by the economic recession. Other barriers to the use of reclaimed water include limited market demand, public health concerns, lack of seasonal storage, and lack of regulatory consistency.</p>
Mono Lake Committee	<p>1. The Mono Lake Committee supports the development of reclaimed water sources and water conservation to their maximum potential to ensure sustainable future water supplies.</p> <p>2. The projections for the use of reclaimed water are 200,000 AFY less than the WaterReuse Association's 1993 survey.</p> <p>3. There are many successful projects that have demonstrated that regulatory and institutional barriers can be readily overcome.</p> <p>4. The Mono Lake Committee is dedicated to maximizing the development of reliable local water supplies for the Southland.</p>	<p>1. Comment noted.</p> <p>2. See response to comments from the City of Los Angeles, Office of Reclamation</p> <p>3. SCAG, MWD and its member agencies have identified water reclamation as the fastest growing source of local water supply in the region. Cooperative working relationships and commitment to project development by water agencies, regulatory agencies, sanitation agencies and all other entities will remove most barriers.</p> <p>4. Comment noted.</p>
Western Riverside Council of Governments	<p>1. No Goals or Implementation Strategies. The Water Resources element needs to set forth a series of goals and implementation strategies similar to the other elements of the RCP. Without these directions and commitments, the element is deficient and does not serve as the basis for sound growth management or the timely provision of services.</p> <p>2. Recommend replacing MWD policy principles concerning growth management with regional water resources goals and implementation strategies that link the RCP</p>	<p>1. MWD and its member agencies are currently engaged in the IRP process. The primary objective of the IRP process is to develop efficient and reliable water supply plans utilizing mixes of local and imported resources as well as demand management options. Water demand projections used in the IRP analyses are consistent with SCAG's growth management plan. One of the most important strengths of the IRP process is that it is an open, participatory decision-making process. Participants in the IRP process include MWD, its member agencies, other water supply agencies, water resources agencies, local government, and representatives from the business, agricultural, and</p>

Source	Comment	Response
	<p>growth management and population projections with the provision of water supplies.</p> <p>3. Planning Strategy Page 10-32. Does this mean that MWD will not grant a "will serve" letter to developments that are inconsistent with the RCP and the growth management policy principles on Pages 10-31?</p> <p>4. BMP Water Savings - "... several conflicting figures for water savings from implementation of BMP's ...". Recommend revising figures cited for BMP water savings to be consistent from one section to another and with each other.</p>	<p>environment communities. One of the key products of the IRP process is a regional resource management plan that will include specific goals and implementation strategies for each water supply resource and demand management option. The resource management plan is scheduled for completion in March 1995.</p> <p>2. Public water agencies and other special districts do not have statutory or constitutional power to regulate land use. General purpose governments, however, can use service restrictions to implement land use decisions under the police power granted by Article XI of the State Constitution. MWD is committed to cooperative working relationships with local water agencies and local government to provide water supplies and facilities to accommodate the growth management plan.</p> <p>3. MWD is a wholesale water supplier serving imported supplies to its member agencies to supplement local water resources available to the local water purveyors. Therefore, MWD does not grant "will serve" letters to developments. However, MWD develops water supply plans based on growth management plans adopted by SCAG and San Diego Association of Governments. Developments inconsistent with regionally adopted growth management plan could lead to water shortages.</p> <p>4. The conservation savings amounts are not conflicting. The 637,000 AFY in Table 10-6 is the total conservation savings projected for 2010 in the MWD service area within the SCAG Region. The 766,200 AFY also in Table 10-6 is the total conservation savings projected for 2010 in the total MWD service area, including San Diego County which is outside of SCAG's region.</p>

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<p>County of Imperial, Board of Supervisors</p>	<ol style="list-style-type: none"> 1. A section must be included at the beginning of this chapter (Chapter 10) that discusses the water resources of the entire southern California area including the desert regions. . . a good understanding of the Colorado River entitlement and system is essential. 2. Requirements for accommodating/mitigating potential environmental impacts must be included in the discussion of each program on page 10-23. 3. In subsection "c" on page 10-23, it should be made clear that the Phase II Water Conservation Program with IID is a potential program and has not been formally discussed or considered. 4. In subsection "d" on page 10-23, the discussion should make it clear that farmers would enter into contracts with IID under both the alfalfa program and the fallowing program. 5. Transfers should be interim or emergency measures to satisfy immediate or short-term problems not a reallocation system. Transfers are important but permanent expansion of developed water supplies is essential to meet environmental, urban and agricultural needs. 6. The best assurance for the planning strategy "... so that agricultural uses do not literally get 'bought out' by the urban uses . . ." is to recognize water transfers as an interim and short-term management tool and make certain this is not a tool to reallocate supplies. 	<ol style="list-style-type: none"> 1. SCAG will prepare response. 2. Mitigation plans for environmental impacts will be developed and implemented as each water supply development program is studied, designed and implemented. However, there is a general discussion of MWD's policy principals regarding Water Supply Development and Environmental Regulations in Section E., Potential Water Issues, of the Element. 3. Text revised to incorporate comment. 4. Text revised to incorporate comment. 5. Comment noted. 6. Comment noted. 7. SCAG will prepare response. 8. SCAG will prepare response. 9. SCAG will prepare response. 10. SCAG will prepare response. 11. SCAG will prepare response

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	<p>7. On page 10-46, the fifth paragraph states that agricultural demand is not projected to increase and that the IID projects no change in agricultural demand. This statement is satisfactory, but IID may have additional needs in the future.</p> <p>8. Tables 10-11 through 10-15 show a constant agricultural water demand for IID of 2,993,614 AF. In reality, this demand will vary each year depending upon cropping patterns, climate, etc. An increase in urban water use is projected in each of the 10-year time frames except the year 2020. The projected increase should be continued into that year.</p> <p>9. Chapter 11 discusses water quality. This section must be consistent with the Regional Water Quality Control Board (RWQCB) requirements. However, some reference needs to be included under Goals and Objectives that local conditions must be given consideration in meeting and sustaining usable water quality.</p>	

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	<p>10. On page 11-8, section 1, a sentence should be added "the New River is a drainage channel that would not exist without municipal and agricultural water." Section 2, the sentence "In addition, toxic contamination is a concern in the Sea due in large part to discharges from Mexican facilities into the New River." should be deleted. The RWQCB has found no evidence of toxic concentrations from Mexico to the Salton Sea.</p> <p>11. In reference to the draft Regional Mobility Element - the Long-Term Transportation Plan for the SCAG region, Chapter 9 (Long-Range Corridors) and Chapter 10 (Financial Program) were not included.</p>	
<p>Sierra Club - Angeles Chapter</p>	<p>1. The draft RCP covers much of the depth and breadth of concerns which must be addressed to insure a viable supply in the future, but overall the focus should emphasize more those features of demand side management.</p> <p>2. It is not clear whether the BMP analysis included the probable realizable benefits from public/commercial ULFT replacement.</p> <p>3. Why is there so little mention of the gray water application?</p> <p>4. Why can we not develop a more pervasive water conservation ethic such has existed in much of northern California for decades?</p>	<p>1. MWD is committed to full implementation of water conservation BMP's. MWD and its member agencies are currently engaged in the IRP process. The primary objective of the IRP process is to develop efficient and reliable resource supply plans to meet customer demands utilizing mixes of local and imported resources as well as demand management options. The IRP process is discussed in Chapter F., Current Planning Process, of the Element.</p> <p>2. The conservation savings projected for 2010, in Table 10-6, have incorporated savings due to the 1991 plumbing code and an estimated savings from ULF toilet retrofit programs within MWD's service area.</p> <p>3. The reason that there is so little mention of graywater</p>

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	<ol style="list-style-type: none"> 5. We need much broader water auditing for BMP's and include agriculture future consensus building. 6. Why is not rationing considered more for average years to decrease need for it in minimal rain year? 7. WaterReuse Association's data for four main MWD service areas - It concludes that, MWD, by 2010, will have roughly one million AF/Yr (.998 MAFY) just for these four MWD Service Areas. 	<p>application in the Water Resources Chapter is because it is not currently considered to be a significant source of water. Graywater is defined as untreated household waste water which has not come into contact with toilet waste. Graywater's application is in the early stages of development and is difficult to monitor because it is limited to personal, household use. The California Building Standards Commission has approved the graywater standards as part of the 1994 California plumbing code; however, these standards do not take effect until November 1994.</p> <ol style="list-style-type: none"> 4. Comment noted. MWD has spent \$ 40.1 million on the Conservation Credits Program in Southern California since 1988, for an anticipated water savings achievement of 260,000 AF in a 10-year period. 5. Comment noted. 6. Rationing is not implemented in average supply years, due to the economic loss to retail customers. Retail customers suffer water shortage costs that are greater than the cost of obtaining water in the average supply years. 7. See Response #3 for the City of Los Angeles' Comments.
<p>County of Ventura, Resource Management Agency</p>	<ol style="list-style-type: none"> 1. Page 10-2, Section A - In the last sentence of the last paragraph in this section, there seems to be a missing letter in the statement . . . Section G through _ of this chapter. 2. Page 10-19, Section C, 2, a - The second sentence erroneously references Table 10-9, when it should have referenced Figure 10-4 on page 10-20. 3. Pages 10-22 and 10-23, Sections C and D - these two pages are out of order (reversed). 	<ol style="list-style-type: none"> 1. SCAG will prepare response. 2. Text revised to incorporate comments 2, 3, 5, 6, 7. 4. No, these figures are not reversed. Typically the minimum year supply occurs when the climate is hotter and drier - also, when water demands are higher.

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	<ol style="list-style-type: none"> 4. Page 10-22, Table 10-10 - The figure 4.84 on the first line of the table under Minimum Year Supply is larger than the figure 4.54 under Average Year Supply, how can this be? Are these figures reversed? 5. Page 10-29, Section D, 5 - The grammar in the last paragraph should be changed from "was" to "were" in the sentence, "Changes to the target quantity was based on population growth . . .?" 6. Page 10-36, Section E, 4, a, i - In order to maintain document consistency, the term "ground water" should be one word. 7. Page 10-53, Section 3, b - In the last sentence of the last paragraph on this section, the term "total dissolved solids" should be used, not "totally dissolved solids". 	
City of El Segundo	<ol style="list-style-type: none"> 1. The City of El Segundo does not support MWD's Best Management Practice to support state and federal legislation prohibiting the sale of toilets using more than 1.6 gallons per flush. In some older buildings ultra-low flush toilets do not work properly and workable replacements must be available for these limited special circumstances. 	<ol style="list-style-type: none"> 1. The prohibition of the sale of toilets using more than 1.6 gallons per flush is now already enacted in State and Federal law, so the voluntary BMP no longer applies. In general, the BMP's are the result of water agencies, public interest groups, and other concerned parties reaching agreement on the definition and standardized implementation of water conservation measures. MWD is just one of 165 state-wide entities that have signed the BMP Memorandum of Understanding. Accordingly, the BMP's are not "MWD's" but are the collective product of a diverse group of state-wide entities wishing to voluntarily improve water efficiency throughout the State.

Source	Comment	Response
<p>County of Orange</p>	<ol style="list-style-type: none"> 1. Clarify the relationship between this RCP component and MWD's planning activities. 2.. It should be indicated more clearly that the growth projections shown in Table 10-2 are for MWD's service area only, and not the entire SCAG region. 3. The chapter should include a brief description of each BMP and/or an appraisal of which ones MWD considers to be the most effective, and/or an indication of relative priority for implementation. Given that single and multifamily residential is the highest sector of water demand, this fact about BMPs' conservation effect is very significant, and warrants more discussion about its implication of the region actually achieving its conservation goals. 4. It would be helpful to add text describing what state agencies will be involved or serving as the lead on developing the SWP programs. 5. The discussion on pages 10-26 through 10-29 could be enhanced to include the role of local governments and local water districts, beyond those of MWD's member agencies in implementing water management strategies. 6. It would be helpful to include appropriate legal citations, and brief summary of the court's holdings in the discussion of growth management issues. 	<ol style="list-style-type: none"> 1. Text revised to incorporate comment. 2. Table 10-2 revised to incorporate comment. 3. MWD is in the process of evaluating the effectiveness of each BMP measure, and developing the priority for implementation. More detailed description of the BMPs will be included in the 1995 update of MWD's Regional Urban Water Management Plan. 4. Text revised to incorporate comment. 5. Metropolitan and its member agencies are currently engaged in the IRP process. The primary objective of the IRP process is to develop efficient and reliable water supply plans utilizing mixes of local and imported resources as well as demand management options. One of the most important strengths of the IRP process is that is designed to include a wide range of resource options and participants in the development of a strategy for meeting regional supply goals. The role of local water districts and local government will be more clearly identified through the IRP process. 6. Reference footnotes are included in the full text of the Water Resources Element for Metropolitan Water District's Service Area. 7. The policy principles on growth management adopted by MWD Board of Directors recognizes the existing stature of local governments in allocating and directing growth and development. These policy principles are used as guidelines for staff to prepare responses to proposed legislature relating to growth management issues.

Source	Comment	Response
	<p>7. The review of the growth management issue should include a reference as to how and to what extent local governments were involved in the development of the growth management policy principals adopted by the MWD Board of Directors.</p> <p>8. The discussion of environmental regulations should be expanded to provide a more detailed appraisal of the specific pollution and contamination problems facing MWD's service area. This would also be an appropriate place to summarize the major problems facing the Sacramento Delta.</p> <p>9. Under the reclaimed water discussion, the text should include a brief description of the actual process(es) used to reclaim water, and the role played by state and local health departments.</p> <p>10. The "mixes" described under the planning schedule should be cited and the implications discussed in the Water Resources Component.</p> <p>11. The component should detail the coordination relationship that is in place to prevent "less than parallel" approaches on water management strategies between MWD and its members versus agencies outside the MWD area, yet both are encompassed within the SCAG region.</p>	<p>8. The suggested discussions are beyond the scope of the water resources chapter. An appraisal of specific pollution and contamination problems facing MWD's service area is contained in MWD Report No. 991, "A Regional Survey of Groundwater Quality in the Metropolitan Water District Service Area," May 1994. A summary of the major problems facing the Sacramento Delta is included in the Department of Water Resources Bulletin 160-93, "The California Water Plan Update."</p> <p>9. The suggested discussions are beyond the scope of the water resources chapter. Discussions on the subjects are contained in the reference report, "Water Recycling 2000: California's Plan for the Future," prepared by the State Water Conservation Coalition's Reclamation/Reuse Task Force and the Bay Delta Reclamation Sub-work Group in September 1991.</p> <p>10. The scope and schedule of the IRP process have been update by the IRP process participants. Text revised to describe update schedule.</p> <p>11. SCAG will prepare response.</p>

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