



PASADENA WATER AND POWER

January 31, 2012

Phil Isenberg, Chairman
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, California 95814

Re: Necessary Revisions to Fifth Draft of Delta Plan

Dear Chairman Isenberg:

Thank you for the opportunity to share our feedback on the fifth draft Delta Plan and EIR. As a member agency of the Metropolitan Water District (MWD) of Southern California, Pasadena Water and Power (PWP) serves over 175,000 people in the Pasadena, Altadena and San Gabriel area.

While we respect and appreciate the Delta Stewardship Council and staff's considerable efforts in advancing the Delta Plan process, we are concerned the plan is overly-prescriptive. The fifth draft Plan attempts to dictate local water management decisions on everything from rate structures to recycling targets. Mandating expanded Urban Water Management Plans to include "new" Water Reliability Elements is unnecessary, as many of these elements have been part of regional plans for years. The Water Reliability Elements are excellent goals, and should be made as recommendations serving as a model plan. The Council's point would be made in a more efficient manner by including the Water Reliability Elements in the fifth draft Delta Plan's Proposed Recommendations, instead of including the elements as a policy mandate and creating another regulation. The last thing the Delta Plan process needs is an additional layer of bureaucracy.

In passing the Delta Reform Act of 2009, the California Legislature did not establish the Delta Stewardship Council to micromanage or dictate local water management decisions throughout the state. It was established to create a plan to coordinate the many local, state and federal efforts in the Delta.

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We fully support the regional self-sufficiency concepts the Stewardship Council is trying to advance. Improved water use efficiency; expanded recycling; back-up plans for service interruptions of Delta supplies; and rate structures that promote conservation are our common goals. But, the draft Plan does not fully appreciate how our agency and water districts throughout Southern California have been advancing regional self-sufficiency for many years prior to the creation of the Stewardship Council and the creation of this draft Delta Plan.

Pasadena's efforts to advance regional self-sufficiency include: Investments in Perchlorate water treatment plants to make existing local water available for use; Calendar year 2011 per-capita water consumption was approximately 20% less than the United Nations Urban Environmental Accords baseline, putting PWP on track to meet and exceed the Urban Accords and statewide conservation goal of 20% reduction by 2020; Recycling water with a project to expand the use of water collected in underground tunnels for golf course irrigation; Expansion of Turf Removal Program with rebates now available to all customer classes; Launch of our "H2O Academy," a suite of educational resources for water conservation; Collaboration with Foothill Municipal Water District, Glendale Water and Power, and Burbank Water and Power to develop and promote free workshops on landscaping with native plants, rainwater harvesting and various tools and techniques for water conservation; Rebates available for High Efficiency Clothes Washers, Weather-Based Irrigation Controllers and Rotating Sprinkler Nozzles to provide more efficient landscape irrigation for residents unable to give up the thirsty roses, for which Pasadena is famous. Our investments in urban water use efficiency, groundwater storage, voluntary water marketing and other water management tools have added operational flexibility and improved our ability to meet demands with existing supplies.

We believe the efforts of our agency and others in Southern California are setting the standard for California on how to reduce reliance on the Delta to meet future needs. Unfortunately, the overly regulatory approach in this draft will threaten the success of the Stewardship Council and detract from prospects for a successful, collaborative approach. Including the Water Reliability Elements with the fifth draft Delta Plan's 61 Proposed Recommendations and not as additional regulations would be a more successful approach to advance a Delta Plan to achieve the co-equal goals of water supply reliability for California and ecosystem restoration for the Delta.

We hope these comments and our continued participation will contribute towards that end.

Sincerely,



Phyllis E. Currie

General Manager