



**CSU Comments on Utah's Regional M&I Water Conservation Goals
Summary Conclusions and Recommendations
March 17, 2019**

Setting regional water conservation goals is extremely important to managing Utah's water in the future, and we commend the effort to set those goals. However, there are fundamental prerequisites that have not yet been defined before such an effort can be meaningful: defining the context and scope of Utah's "water management" task, the place of "recommended regional water conservation goals" in that context, and the management structure necessary to properly define goals (and objectives) and to implement them. Those prerequisites impact the process used to define the recommended goals. There also appear to be significant issues in the process independent of the prerequisites, as well as issues in the execution of the process. These are of such significance that in our judgment invalidate the recommended goals defined in the draft document. The following points summarize the Conclusions and Recommendations section of the [Detailed Comments](#) document.

Conclusions:

- It is an insufficient and perhaps inappropriate step to define "Utah's Recommended Regional Water Conservation Goals". The target that must be agreed upon is "regional water demand objectives" (see the Detailed Comments for a definition of these terms in order to understand the difference), and the plans to implement them. Without a clear context and scope statement and a program management structure to manage Utah's water, goals or objectives, it will be extremely difficult to address Utah's water challenge.
- Regardless (or because) of that over-arching issue, the recommended state and regional water demand/conservation goals are far too conservative (meaning "preserving existing conditions") to be useful, indicating a far higher water demand in 2065 than what has already been achieved in many other vibrant communities, one that may not be supported by Utah's water supply. As a result of issues and errors in the process discussed in our Detailed Comments, the recommended regional water conservation goals are insufficient, targeting far too conservative a reduction in demand.
- The recommendations for practices to be implemented are not specific enough to provide the needed guidance to local governments. State leadership needs to be significantly improved and the effort needs to be much more integrated from the state to the regions (and/or counties and cities).
- Water conservation planning processes (and water management processes in general) are inadequate and will not enable goals to be reached. The progress made in decreasing per capita M&I water demand largely has been due to the natural forces of growth: bigger homes on smaller lots and Commercial, Industrial and Institutional (CII) use spread over more people. Our analysis indicates past and current focus on passive conservation (voluntary measures with poor incentives to reduce use of cheap water) rather than the implementation of active conservation practices has missed opportunities to change human behavior that would result in significant demand reduction.
- As evidenced by these points, it appears that the DWRe is having difficulty adapting from its historical role of managing our water supply to managing water conservation and demand. This must change if the state is to meet its rapidly approaching challenges in water management.

Recommendations:

1. To avoid the appearance of bias, exclusiveness and a lack of transparency, immediately develop a set of principles, policies and practices to be used in developing the state's water management direction, using inclusive and open processes to avoid issues such as those reflected in our Detailed Comments; use those principles and practices in all future actions, including those recommended below.
2. Provide more direct and active state leadership by creating a Utah Water Management Program, integrated with regional programs (and/or county or municipal), implementing program management principles and processes, to manage the actions to address our water supply and demand challenges, including context and scope definitions that enable full management of the state's water and an understanding of terms for both supply and demand management and the role of water conservation. From this structure, projects to derive both supply and demand data can be initiated. The work done in defining the subject document ("Utah's Recommended Regional Water Conservation Goals"), provide a good starting point for defining the "regional water demand objectives". Establishing this program management structure may require action by the state executive and/or legislative branches.
3. Correct and improve Utah's State and Regional Water Demand Goals and Objectives in an open and transparent process of public engagement, including accountability to the [Legislative Audit](#) and the [State Water Strategy](#), correcting and detailing the process to address the issues identified in our Detailed Comments, and re-deriving the goals using those process updates.
4. In the context of the Utah Water Management Program, define, plan and execute actions (projects) to address state-wide water management including defining regional program integration processes and responsibilities, agricultural water demand goals, and future supply estimates.

The Recommended Goal for Washington County

Our analysis of existing data indicates that the objective for Washington County must be more like 175 gallons per capita daily (GPCD) in 2065 rather than the 259 GPCD goal recommended in the subject document. A similar objective should be set for the state in general, although certain regions with more water and less adjustable demand could set a somewhat less aggressive target.

Closing

Our state and local governments and their water agencies must improve the leadership of our water management, and with some urgency. Every bit of unwise use allowed today will add to tomorrow's problem. Unwise investments in water use made by Utah's citizens in their homes, businesses, institutions and farms cannot be easily or quickly reversed, and their effects have a long life. Most of those investments have not been made yet and they can still be influenced. Many unwise investments over the past 25 years, during which the problem should have been known, could have been avoided. Our governments and water agencies, with engagement of experts and the public, must agree on how water demand/conservation goals are to be defined and how to plan their implementation. This cannot be done without significantly improved engagement and management processes.

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