

## CSU Position on Water Conservation and the LPP

Washington County should focus on water conservation, becoming exemplary users of our local water supply, and consider the Lake Powell Pipeline after

1. use has become exemplary
2. the security of the water right and the climate impacts to the Colorado River flows are better known, and
3. the population growth has been realized and can reduce the interest burden through a shorter loan period.

### **Rationale and Explanation:**

#### 1. Exemplary water use

- We use a lot more water than needed to retain a viable, attractive community. Other comparable Southwestern communities use much less.
- Water agencies contend that because comparisons to other communities are “apples to oranges”, they can’t be compared. This is incorrect. No two real entities are exactly comparable, even two apples. Differences must be recognized and addressed. There is a common scientific method called “normalization” for performing comparisons of data about two entities that are not identical. We should enlist the DWRe to help in making those comparisons.
- Reducing our M&I water use from 300 GPCD to 180 over the next 50 years would enable us to support our projected population growth with our local water. This could be done incrementally, with little or no debt/interest, and with a much lower principle investment than the LPP. We should enlist the DWRe to help determine if/how to make this happen, what the cost/yield is, what different levels of water use in our community would look like, set meaningful and realistic objectives for our future water use, and then build a plan for it.
- There have been few active conservation methods implemented in the county. Many *active* conservation methods (not relying on voluntary or “pull” actions by the public) have high yields and low costs, like conservation-minded revenue streams and water-wise building codes. Even though [Utah law](#) (section 2.a.i) is fairly weak in its requirement for water conservation planning, DWRe guidelines are weaker yet, and even though most “plans” in the state, including those in Washington County, follow those guidelines, they do not meet state requirements, do not qualify as a “plan”, and indicate conservation is not taken seriously.

#### 2. The water right risk

Utah’s ability to support the LPP with its allocation of the Colorado River is based on the assumption that river flows will not decrease much below the 1922 Compact assumption of 15 MAFY. For the past 20 years it has averaged more like 12.5 MAFY. Climate projections indicate a significant chance of it going to 9 MAFY within the next 50 years. At that flow, Utah is currently using more than its allocation, not counting the LPP. There is no concept, much less a plan, for supplying the LPP under those conditions. We should enlist the DWRe and the BOR to help define the concept and the plan.

#### 3. Reduced interest

At the LPP’s estimated cost of \$1.5B, normal interests costs at 5% over the proposed 50-year period would be about \$2.5B. If we could wait 20 years or more for our population to grow as projected, we could plan a 30-year payback rather than a 50-year payback, saving over \$1B in interest.

**Key Questions, upon which fact-based answers are required to support any position:**

1. LPP Water Right Security
  - a. What is the projected high-probability long-term Colorado River flow rate?
  - b. What is Utah's allocation of the Colorado River under the projected high-probability long-term flow rate?
  - c. What is the high-probability projected cumulative perfected depletion of all water rights senior to the LPP's water right?
  - d. What is the concept and plan for supplying the LPP's water if senior water rights exhaust Utah's allocation?
2. Washington County Water Supply and Demand
  - a. What is the projected high-probability local water availability?
  - b. What water use would be considered exemplary in comparison to other communities?
  - c. What is the plan to achieve that use?
  - d. In what projected year is the local water supply challenged by exemplary demand?
3. Water Management
  - a. Do the water conservation plans in the county (and the DWRe guidelines for them) meet the requirements of state law?
  - b. What elements are required to satisfy the common dictionary and management definitions of a plan?
  - c. How should the county set a water use goal and objective, and have they been set?
  - d. What is the plan to meet demand if the LPP water right is not secure enough to responsibly build the LPP, or if financing cannot be secured?
4. Fiscal Responsibility
  - a. What interest cost could be saved by waiting until exemplary use does not
  - b. What revenue mix would be the fairest (in terms of cost/benefit) and best encourage conservation?
  - c. Are there implications/constraints in state law?
5. Bottom Line

Doesn't it make sense from both fiscal and risk reduction perspectives to conserve now and postpone the LPP as long as possible?

***CSU's current answers***

- 1a. Perhaps 9 MAFY*
- 1b. Perhaps as low as 800,000 AFY, depending on interstate agreements.*
- 1c. Perhaps 1.2MAFY; more than the allocation and current use, not counting the LPP.*
- 1d. There is none.*
- 2a. 100,000 AFY, per the WCWCD*
- 2b. Perhaps 180 GPCD*
- 2c. There is no plan to reduce from the current 300 GPCD.*
- 2d. 2065*
- 3a. No*
- 3b. See [analysis and definition](#).*
- 3c. See*
- 3d. There is none.*
- 4a. \$1B*
- 4b. See proposal*
- 4c. Yes*