

## What is a Water Conservation Plan?

### Requirements for Water Conservation Plans:

1. [Title 30 TAC Chapter 288, Rule §288.2](#): Texas Commission on Environmental Quality Requirements
2. [Title 31 TAC Chapter 363, Rule §363.15](#): Texas Water Development Board Requirements

The Water Conservation Plan (WCP) requirements can be found in the above hyperlinks. These outline the state of Texas' minimum requirements for the completion of the WCP. **But what does this mean, what is a WCP?**

A WCP should be more than the minimum requirements found above. It is meant to be a self-serving written document, in which a utility can **plan, program, and create** a sustainable and efficient water conservation program. A program that, over time, can help the utility prepare for increasing population growth, water shortages, high seasonal demand, and potential water scarcity.

The WCP serves as a map, that when developed properly, can help guide a utility on a path of smart and efficient water use practices, reductions in water loss (apparent and real), and education and outreach for their customers at large. The WCP should incorporate current and future strategies, analyzing why water is important to the utility, and what water conservation strategies they are willing to implement to create a sustainable water future.

This may sound like a Drought Contingency Plan (DCP); however, a DCP is a **reactive document**. The DCP is a strategy or a combination of strategies for responding to temporary water supply shortages.

We write WCP's because we always want to be **proactive**. A plan that is in place all year long to help conserve water.

There are three instances when a Water Conservation Plan should be submitted to the TWDB:

1. **entities applying for or receiving financial assistance of greater than \$500,000 from the TWDB.**
2. **entities with 3,300 connections or more.**
3. **entities that have a surface water right through TCEQ.**

A WCP should be a thoroughly reviewed document and can be approximately 10 to 100 pages long (*highly variable, depending on strategies and attachments*). The plan must meet the minimum requirements as stated **and should be no older than 5 years of the initial requirement date.**

The WCP should also include a Utility Profile (UP), which is an evaluation of the entities' water and wastewater system and customer water use characteristics, to identify water

conservation opportunities and should be used to set goals through water conservation measures. Completing the UP is the first step in developing a WCP (*See reference document, 'What is a Utility Profile?'*)

The composition of the WCP should follow a thoughtful, logical, and linear structure starting with the UP and working through the mandated requirements. Think of the requirements as a framework. **It is the entities job to build out that framework to create a fully realized and comprehensive plan.**

The TWDB wants you to craft this plan, tell us what you have accomplished, what conservation strategies have worked, and which strategies did not. Tell us what conservation programs you have planned for the future, or even what you wish you could implement.

The below is a guidance framework on how a Water Conservation Plan should be structured. This should represent 5 years of historic water system data for the entity and 5 to 10 years in the future. The WCP needs to tell us how/what the entity has and will do to conserve water.

1. **Water Conservation Utility Profile, TWDB-1965:** An evaluation of the applicant's water and wastewater system and customer use characteristics to identify water conservation opportunities and potential targets and goals.
2. **Conservation Coordinator:** Include a designated person as the **water conservation coordinator** responsible for implementing the water conservation plan; and identify, in writing, the water conservation coordinator to the executive administrator of the board.
3. **5- and 10-year goals in GPCD:** Inclusion of five-year and ten-year targets that are specific and quantified for water savings and include goals for water loss programs, and goals for municipal use and residential use, in gallons per capita per day or GPCD (**i.e., Total GPCD, Residential GPCD, and Water Loss GPCD**). A base use figure, or baseline, should be included to calculate your estimated savings.
4. **Achieving Targets:** schedule for implementing the plan to achieve the utilities targets and goals.
5. **Tracking Targets and Goals:** Describe the method for tracking the implementation and effectiveness of the plan. The method should track annual water use and provide information to evaluate the implementation of conservation measures.
6. **Production Meter(s):** A meter to measure and account for water diverted from the source of supply to the system.

7. **Universal Metering Program:** A program of universal metering of both customer and public uses of water, for meter testing, repair and for periodic replacement (i.e., maintaining meter accuracy by ongoing testing, repairing and an aged meter replacement program).
8. **Water Loss Control Program:** Measures to determine and control water loss. A program that helps to identify real or physical losses of water from the water system and apparent losses, or the water that is consumed but not accounted for (some examples are, periodic visual inspections along distribution lines; annual or monthly auditing of the water system to determine illegal connections, or abandoned services, and repairing or replacing meters regularly to ensure efficiency and meter accuracy).
9. **Leak Detection Program:** A continuous program of leak detection, repair, and water loss accounting for the transmission, delivery, and distribution system in order to control water loss. Estimate how much the utility can save by repairing the leaks in the system.
10. **Public Education and Information:** A program of continuing education and information regarding water conservation. This should include providing water conservation information directly to each residential, industrial, and commercial customer at least annually, and providing water conservation literature to new customers when they apply for service. The goal is education of customers about the overall picture of water resources in the community and how conservation is
11. **Water Rate Structure:** A water rate structure which is not “promotional,” i.e., a rate structure which is cost-based, and which does not encourage the excessive use of water. **Include a copy of the rate structure (i.e., Rate Table or Rate Ordinance)**
12. **Signed Official Ordinance:** A means of implementation and enforcement, evidenced by adoption of the plan: a **copy of the ordinance**, resolution, or tariff indicating official adoption of the Water Conservation Plan by the applicant and a description of the authority by which the applicant will implement and enforce the Water Conservation Plan.
13. **Wholesale or Contract:** If the applicant will furnish water or wastewater services to another supplying entity that in turn will furnish the water or wastewater services to the ultimate consumer, the requirements for the Water Conservation Plan also pertain to these supplier entities. To comply with this requirement the applicant shall:
  1. submit its own Water Conservation Plan;
  2. submit the other entity’s (or entities) Water Conservation Plan;

3. require, by contract, that the other entity (or entities), adopt a Water Conservation Plan that conforms to the board's requirement and submit it to the board.
  
14. **Regional Water Planning Group Notification:** Documentation that the regional water planning group for the service area of the applicant or utility has been notified of the applicant's updated Water Conservation Plan (i.e., this can be a copy of the letter, email, or fax cover page) A **COPY must be sent** to the appropriate parties.

Please contact the Municipal Water Conservation Team for guidance and references when beginning this process.

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