

From: **John Mills** <[sixbit@mlode.com](mailto:sixbit@mlode.com)>  
Date: Fri, Sep 12, 2008 at 7:01 AM  
Subject: 20 x 2020 Public Draft Technical Memorandum...  
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Cc: [2020comments@ccp.csus.edu](mailto:2020comments@ccp.csus.edu), petek Kampa <[pkampa@tuolumneutilities.com](mailto:pkampa@tuolumneutilities.com)>, Tom Scesa <[tscesa@tuolumneutilities.com](mailto:tscesa@tuolumneutilities.com)>

Kamyar:

Have give this document a quick once over and have some initial concerns. These comments are not intended to be represent our comprehensive review of the document.

It is clear that this is a statewide document representing a first cut at defining a baseline of water use based on the hydrologic regions of the state. As such it represents a necessary starting point, however, it is not an accurate representation of some portions of the state, specifically those west slope, Sierra Nevada water systems: the Mountain Counties Region.

First impression comments on the Memorandum:

1. It fails to recognize the Mountain Counties area as an area of special characteristics which significantly influence water use and therefore a baseline. These factors include the unique hydrologic and water use conditions of the region, the historic legacy of water system development going back to the gold rush and the resulting mixed use delivery systems (urban and agriculture in one raw water delivery system) which result in conveyance conditions unlike those elsewhere in the State. These important factors should be recognized in establishing baseline numbers of water use. Please recall it was these same conditions - and others that lead to the Bulletin 160-05/09 State Water Planning Process to recognize the Mountain Counties area as a special region. Failure to recognize those unique conditions in the current baseline computations will confound efforts to develop an accurate baseline condition and could hamstring conservation efforts unnecessarily. It could also result in inequitable standards being imposed in these areas due to the inaccuracy of the baseline computations.

2. The GPCD baseline fails to capture the need for a baseline as a measurement of system water use and instead focuses only on end user. This fails to recognize the conditions that exist within conveyance systems in the Mountain Counties area (open ditch systems composed of earthen ditches, lined ditches, wooden flumes and some piped areas). Those conveyance systems have s\water delivery inefficiencies which could be a source of significant water use efficiency on a system wide basis. Directing attention at end user, treated water measurements and focusing conservation at that point of the system would miss golden opportunities for improved water use efficiency on a system wide basis. The importance of including raw water delivery systems in this special area of the state must be included.

3. The Mountain Counties region enjoys significant tourism throughout the year which can boost the functional population being served by significant numbers - ranging from approximately 25 percent to nearly 100 percent. That water use is part of the baseline for urban (commercial and recreational use) and must be accounted for in those areas. Again, failure to recognize this unique Mountain Counties condition will cause problems in later analysis and application of target efficiencies.

4. Recycling in some areas of the Mountain Counties (Tuolumne County for example) is nearly at 100%. This is clearly missed in the San Joaquin wide region broad brush analysis.

5. Where actual detailed water agency customer and system wide use numbers are available those numbers and not a computed or estimated baseline should be used. Moving from more accurate data to regional estimates on flawed assumptions is not a good direction for this process.

6. Tuolumne is misspelled. It is not Tuolomne.

We will send detailed comments on the 20 x 2020 program as well as the Public Draft Technical Memorandum by your September 22nd deadline.

Thank you for the chance to review.

Best,

John

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