



**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

December 5, 2008

20X2020 Agency Team  
Department of Water Resources  
1416 Ninth Street  
Sacramento, CA 94236-001

VIA EMAIL  
2020comments@ccp.csus.edu

Dear 20X2020 Agency Team:

Comments on the Governor's 20X2020 Statewide Water Conservation and Implementation Plan

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to provide comments on the Governor's 20X2020 Statewide Water Conservation and Implementation Plan as described at the November 20, 2008 workshop.

Metropolitan has identified the following issues that it would like to see addressed.

**1. More Study Is Needed For Savings Estimates**

The uncertainty inherent in key factors used to calculate water use and potential water savings are appropriately recognized in the Task 5 Technical Memorandum. With this in mind, ongoing efforts are needed to verify savings actually realized from BMP implementation and other water use efficiency measures. Water use reduction targets should be adjusted according to empirical rather than hypothetical savings rates.

**2. Remove Loading Order Concept in Favor of Portfolio Planning**

The "loading order" model used for electricity—where least-cost is the primary consideration—may not be appropriate for water. There is a type of control and predictability affecting the production and distribution of energy which does not apply to water. The production of water is unpredictable and its movement from any single source is capacity constrained. The "portfolio" approach provides greater flexibility in recognizing that the availability of specific sources of supply is subject to varying hydrological conditions, infrastructure limitations and water quality and environmental considerations.

**3. Target Bottom Up Water Budgets, Instead of Top Down GPCD Reductions**

Methods other than simple gallon per capita day (GPCD) reductions should be considered in setting water reduction targets. Uniform GPCD reductions can unfairly penalize past savers. Furthermore, simple GPCD reductions do not necessarily result in efficient water use targets. Water budgets that allocate water based on persons per household for indoor use and water-specific factors such as lot size and plant material for outdoor use provide a more equitable basis for setting water reduction targets and are a much better method for targeting efficiency.

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**4. Fully Recognize Recycled Water as an Efficiency Measure**

Recycled water that replaces the demand for potable supplies should be credited towards water reduction targets. Some members of the 20X2020 Team seemed to waiver on this point. But recycling that displaces potable demand leaves water in streams and rivers or makes it available for other beneficial uses. In this regard, the efficiency gains from water recycling are similar to those realized through industrial recirculation, a measure that is recognized as promoting water use efficiency. Indeed, recycling often achieves a 100 percent displacement of potable supplies, far more than traditional conservation measures.

**5. State Codes and Product Standards**

State plumbing codes have proven to be highly cost-effective conservation measures. Consideration should be given to the development of additional standards. Additionally, the state should consider the development of water use efficiency product standards for a broader array of water-using devices.

**6. Minimum Requirements of Code Compliance and BMP Implementation**

We repeat our concern from our earlier comment letter that regions of the state with diverse water use baselines are being given similar GPCD targets. The South Coast Region and the San Francisco Bay Region are estimated to have baseline use of 180 GPCD and 154 GPCD respectively, but the targets for these two regions are nearly identical. The inequity of these targets was further demonstrated in the Task 4 Technical Memo, which showed that the San Francisco Bay Region would not even have to meet a minimum standard of code compliance and BMP implementation to meet their target. By not capturing the yield of this minimum standard, the 20x2020 process is forced to set higher reduction goals for other regions in the state. We strongly encourage the 20x2020 team to incorporate an appropriate feedback loop to the target setting process with this information and set reduction targets for regions that at least assume the full compliance with state code and BMP implementation.

In conclusion, Metropolitan strongly supports the Governor's effort to maximize cost-effective water use efficiency measures. At the same time, we requests that these measures be grounded, to the extent possible, in empirical science; that the plan and its implementation be transparent; and that the effort required be equitable across all hydrologic regions and water sectors.

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If you have any questions, please contact Mr. Timothy Blair of my staff at (213) 217-6613 or via email at [tblair@mwdh2o.com](mailto:tblair@mwdh2o.com).

Very truly yours,



Stephen N. Arakawa  
Manager, Water Resource Management

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