



city of san luis obispo

879 Morro Street • San Luis Obispo, CA 93401

May 21, 2009

State Water Resources Control Board
P.O. Box 2000
Sacramento, CA 95812

Subject: Comments on Draft 20X2020 Plan

Dear Sir/Madam:

Thank you for the opportunity to comment on the State's Draft 20X2020 Plan. The City of San Luis Obispo supports the State's broad goals set forth in the Draft Plan to reduce overall water use through effective demand management tools. The City was one of the original signatories in 1991 to the Memorandum of Understanding regarding urban water conservation which established the California Urban Water Conservation Council.

The City continues to be recognized as a statewide leader in water conservation due to efforts the community initiated as a result of the severe water shortage it experienced during the 1987-91 drought. These efforts continue today. Per capita water consumption has been reduced from a high of 182 gallons per person per day (gpcd) to about 125 gpcd, a 30% ongoing reduction.

The City has significant concerns with the methodology used in the State's draft 20X2020 Plan for establishing regional reduction goals. The draft Plan acknowledges there is a lack of good data for establishing the regional reduction goals. Additionally, the Draft Plan notes there are limitations associated with establishing a baseline per capita rate for the 10 regions shown on Figure 1 of the Plan (page 5) instead of basing it on evapotranspiration zones as shown on Figure 2 (page 6), but then proceeds to establish a baseline goal by region without acceptable justification as to why that methodology was chosen.

In San Luis Obispo County, it is not uncommon for there to be a 40 degree temperature variance between the coastal areas and the inland zones. As one would expect, this results in significant variances in water use within the same "region" proposed by the State's Draft Plan.

The City is also concerned the State is proposing to establish a baseline water use amount based on a particular year (2005). Adopting this baseline, in effect, penalizes the City of San Luis Obispo for its proactive approach to water demand management over the past



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20 years and does not acknowledge the citizens' success in reducing water consumption on an ongoing basis.

The City requests that if the State decides to use regions as outlined in the Draft Plan, consideration be given to agencies, such as San Luis Obispo, that have demonstrated successful implementation of the water conservation "Best Management Practices" for almost two decades.

In summary, the City has the following major concerns with the Draft Plan and requests that these issues be given further consideration:

1. Recognition for past water conservation efforts made by agencies.
2. Regional versus climate zone baseline goals.
3. Methodology for establishing baseline per capita use.

If you need additional information related to our comments please contact the City's Water Division Manager, Gary Henderson at 805.781.7237 or me at 805.781.7215.

Sincerely,


Carrie Mattingly
Utilities Director

c: File