



May 22, 2009

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By Electronic Transmittal to: 2020comments@waterboards.ca.gov

20x2020 Agency Team
C/O California Department of Water Resources
1416 Ninth Street, P.O. Box 942836
Sacramento, CA 94236-0001

Subject: 20x2020 Water Conservation Plan

Thank you for the opportunity to comment on the April 30, 2009 Draft 20x2020 Water Conservation Plan. Eastern Municipal Water District (EMWD) is proactive about encouraging water-use efficiency and supports the Governor's statewide goal to reduce water per capita water use. The information in the Plan is useful and informative, but additional consideration is required to complete a plan for statewide reduction in gallons per capita per day.

EMWD offers the follow general comments on the Plan for your consideration:

1. Targets in the Plan are currently set for the 10 hydrologic regions across the State. These targets do not account for the variation in weather and hydrology within those regions. There is not a method that can be used to translate the regional goals to a local or agency level.
2. A single year, 2005, is used for the baseline of the report. Although statewide and regional trend may remain flat, there may be significant variation from year to year at the local or agency level.
3. Some recommendations are prescriptive and do not take into account inequalities across the State. Any plan for State reduction in water use should allow flexibility for agencies to pursue water-use efficiency in the most cost-effective and efficient manner for their area.
4. Recycled water use should be included in any baseline calculations. When considering progress towards a target, gallons per capita per day, recycled water-use should be excluded.
5. The definition of recycled water should include indirect use of recycled water for potable purposes.

Water efficiency should be measured on a local level and take into account local factors such as weather, land use patterns, use of recycled water, and industry and housing density. While per capita water use can be a valid measure for an

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agency's efforts to reduce water demand, a comparison of per capita use between agencies or across a region, may be less useful for measuring efficiency.

Efforts to develop a plan that will reduce water demands statewide should be a collaborative process with water purveyors. Solutions should be flexible to allow local agencies to implement the best option for local conditions. Full credit should be given for past and future investments in recycled water efforts, including indirect reuse through groundwater recharge or reservoir augmentation. Consideration must be given to the commercial, industrial and institutional (CII) sector when requiring reduction in water demand. CII best management practices must be developed that can cost effectively reduce water demand without hindering production levels.

EMWD is committed to increasing water-use efficiency within its service area and looks forward to working with the State to develop an effective implementation plan for reducing water demand.

If you have questions or concerns, please do not hesitate to contact me at (951) 928-3777, Ext. 4307.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Lovsted". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Elizabeth Lovsted
Sr. Civil Engineer