



May 22, 2009

Agency Team Members
State Water Resources Control Board
1001 I Street
Sacramento, California 95814

Re: Comments on Draft Water Conservation Plan 20x2020

Dear Agency Team Members:

Casitas Municipal Water District appreciates all the effort that has gone into the development of the 20x2020 plan by the participating members of the Agency Team. Casitas respectfully requests your consideration to some of our concerns with the current draft of the 20x2020 plan. First, Casitas strongly supports the implementation of water conservation measures both locally and statewide. Casitas is committed to accomplishing all of the water conservation best management practices set forth in the California Urban Water Conservation Council's urban water conservation best management practices. Casitas is a signatory member of the Council and has an adopted Memorandum of Understanding with the Council. Secondly, Casitas has implemented all of the agricultural water conservation best management practices, which is not included in your recommendations.

The most notable concern included in the Draft 20x2020 Water Conservation Plan is the choice of 2005 as a single baseline year because it was the wettest rain year in our District since our earliest available rain record in 1868. A wet rain year means that water demand is significantly lower for that year. A baseline year is likely to be more effective if a several year average figure is used rather than a single year. It is surprising that your data would suggest no discernable change in usage from year to year in the South Coast region, especially for 2005. For example, in 2005 Casitas' urban GPCD was a low 389.99 compared to an average rain year in 2004 when it was 3.5 percent more at 403.61 GPCD. This appears to be a significant enough fluctuation in overall urban water usage to impact the GPCD figure.

A Gallons Per Capita Day (GPCD) methodology for water planning becomes irrelevant for Casitas in terms of attaining the South Coast Region's 149 GPCD objective. Casitas has a small number of non-densely populated residents balanced against other large urban usages within the district so the GPCD figure is artificially high. Specifically, Casitas has an unusual mix of commercial, institutional and industrial customers that include a large number of private schools, resorts and oil production facilities that compromises attainment of the suggested GPCD target, which seems to be based on more densely populated residential areas of the state.

The Draft Water Conservation Plan does not specifically target individual agency goals but lumps large regions together. This is problematic in that Western Ventura County has been placed in the South Coast region and yet it is completely separate in all aspects of water supply and demand. All of the water supply in Western Ventura County is provided by local rainfall and the area continues to have little to no population growth. There are about 100,000 people that live in this area and at this time, not dependent upon the State Water Project.

Casitas is fully committed to implementing aggressive water conservation programs and will continue to do so. However we urge you to consider that not all regions of the state or individual suppliers easily fit into one size fits all criteria.

Sincerely,

Ron Merckling
Water Conservation/Public Affairs Manager